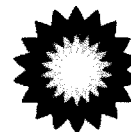


bp

FILE COPY



BP Products North America Inc.
2401 5th Avenue South
Post Office Box 401
Texas City, TX 77590
USA
Switchboard 409 945 1011
HSE Fax 409 941 6670

May 16, 2011

CERTIFIED MAIL# 7003 1010 0003 8830 9535
RETURN RECEIPT REQUESTED

Camilla Widenhofer
Texas Commission on Environmental Quality
Air Permits Division, Federal Operating Permits (Title V) Section
MC 163
PO Box 13087
Austin, TX 78711-3087

RE: WDP Comments
Federal Operating Permit O1541
BP Products North America Inc.
Texas City Refinery
CN600866800, RN102535077
TCEQ Project No. 13408

Dear Ms. Widenhofer:

BP Products North America, Inc. (BP) owns and operates the Texas City Refinery which operates under the Federal Operating Permit (FOP) No. O1541 issued December 7, 2004. BP submitted a Renewal and Significant Revision application for this FOP on February 25, 2009 which has since been assigned to you for technical review.

With this submittal, BP is making the following changes:

1. Revise applicability for TCH-SRUAB, TCH-SRUCD, and TCH-SW to show that these flares are not subject to NSPS J or Ja. Please remove attributes previously submitted for these flares on form OP-UA50. Please see OP-REQ2 forms attached for documentation of negative applicability.
2. Revise applicability for TCH-SRUAB, TCH-SRUCD, and TCH-SW to show that the vents routed to these flares are not subject to MACT CC. Please remove attributes previously submitted for these vents on form OP-UA15. Please see OP-REQ2 forms attached for documentation of negative applicability.
3. Revised OP-REQ1 page 38 is attached to add NSPS GGGa to section XI.B.2. BP has new equipment components that are subject to the fugitive monitoring requirements of this new LDAR rule.

4. Revise Case-by-Case CAM proposed for carbon canisters to be consistent with the monitoring frequency and breakthrough thresholds established in NSR permit 47256. See revised OP-MON forms attached.
5. Revise NSR authorizations for several sources. See OP-SUMR form attached.
6. Please remove NSR Authorizations 46724 and 46725, they were added in the most recent OP-REQ1 update, but were rolled into NSR permit 47256.
7. Please add NSR Authorization X-15271 to the list of authorization on the OP-REQ1, it was removed during our last OP-REQ1 submittal by error.

BP would also like to provide you with the following updates regarding the incorporation of CAM in the appropriate NSR permits:

1. CAM has been incorporated into NSR Permit 9606 for TCH-6, effective date 11/30/2010.
2. CAM has been incorporated into NSR Permit 2612 for TCH-AU2, effective date 11/30/2010.
3. CAM has been incorporated into NSR Permit 22107 for TO-WWTP, effective date 8/24/2010.
4. For all sources subject to CAM that are authorized by NSR Permit 47256, the original request to incorporate CAM via permit alteration was voided for administrative reasons. This permit has been in a great deal of flux, due to amendment projects, incorporating MSS, and the project to de-flex the permit. The permit application to convert this flexible permit to a Subchapter B permit is required to be submitted June 30, 2011. BP will submit a new permit alteration request to incorporate CAM for these sources by July 15, 2011.

Additionally, to address EPA's concerns on related Title V permits that incorporate PSD permits by reference, the currently effective version of Permit 47256/PSD-TX-402M2 and Permit 19599/PSD-TX-023 is attached so that you may attach it to Title V permit O1541.

Thank you for your continued review. If you have any questions on this submittal or require additional information, please feel free to contact Shela Leavings at (409) 942-4017 or shela.leavings@bp.com. Thank you for your attention to this matter.

Sincerely,



Paula LaRocca
Environmental Team Lead - Air

SL/dm
Attachments

Camilla Widenhofer, Air Permits Division
Texas Commission on Environmental Quality
May 16, 2011

cc: Ms. Linda Vasse, Regional Director, TCEQ Region 12, Houston
Mr. Ron Schultz, Director, Galveston County Health District
Ms. Stephanie Piepho, Managing Consultant, Trinity Consultants

Camilla Widenhofer, Air Permits Division
Texas Commission on Environmental Quality
April 15, 2011

bcc: TCEQ 2011
Paula LaRocca
Shela Leavings
File ENV.2.A.28 TCR



Texas Commission on Environmental Quality
Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2
Table 2

Date: 5/16/2011	Permit No.: 01541	Account No.: GB-0004-L	Regulated Entity No.: RN102535077
Area Name: Texas City Refinery		Company Name: BP Products North America, Inc.	Customer Reference No.: CN600866800

I. DESCRIPTION OF REVISION						
Revision No.	Revision Code	New Unit	Unit/Group/Process ID No.	Applicable Form	NSR Authorization	Description of Changes and Provisional Terms and Conditions
1	MS-C	No	TCH-1	OP-UA7	N/A	Remove unit from Title V permit. Permanently out of service.
2	SIG-E	No	TCH-SRUAB	OP-UA7	N/A	Revise applicability to show that this flare is not subject to NSPS J or Ja. Flare no longer combusts fuel gas in normal operations. Please remove attributes previously submitted for these flares on form OP-UA50. Add to permit shield.
3	SIG-E	No	TCH-SRUCD	OP-UA7	N/A	Revise applicability to show that this flare is not subject to NSPS J or Ja. Flare no longer combusts fuel gas in normal operations. Please remove attributes previously submitted for these flares on form OP-UA50. Add to permit shield.
4	SIG-E	No	TCH-SW	OP-UA7	N/A	Revise applicability to show that this flare is not subject to NSPS J or Ja. Flare no longer combusts fuel gas in normal operations. Please remove attributes previously submitted for these flares on form OP-UA50. Add to permit shield.
5	SIG-E	No	TCH-SRUAB	OP-UA15	N/A	Revise applicability to show that this vent routed to flare is not subject to MACT CC. Flare no longer used to control MACT CC miscellaneous process vent. Please remove attributes previously submitted for these flares on form OP-UA15 Table 5. Add to permit shield.
6	SIG-E	No	TCH-SRUCD	OP-UA15	N/A	Revise applicability to show that this vent routed to flare is not subject to MACT CC. Flare no longer used to control MACT CC miscellaneous process vent. Please remove attributes previously submitted for these flares on form OP-UA15 Table 5. Add to permit shield.
7	SIG-E	No	TCH-SW	OP-UA15	N/A	Revise applicability to show that this vent routed to flare is not subject to MACT CC. Flare no longer used to control MACT CC miscellaneous process vent. Please remove attributes previously submitted for these flares on form OP-UA15 Table 5. Add to permit shield.
8	MS-C	No	N/A	OP-REQ1	N/A	Revise OP-REQ1 page 38 section XI.B.2 to add NSPS GGGa. BP has new equipment components that are subject to the fugitive monitoring requirements of this new LDAR rule.
9	MS-C	No	ARU-SEP	OP-MON	N/A	Revise deviation limit, indicator, and frequency on OP-MON form for CAM for consistency with monitoring approved in permit 47256 for same sources.



Texas Commission on Environmental Quality
Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2
Table 2

Date: 5/16/2011	Permit No.: O1541	Account No.: GB-0004-L	Regulated Entity No.: RN102535077
Area Name: Texas City Refinery		Company Name: BP Products North America, Inc.	Customer Reference No.: CN600866800

I. DESCRIPTION OF REVISION						
Revision No.	Revision Code	Unit/Group/Process			NSR Authorization	Description of Changes and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
10	MS-C	No	AU2-SEP	OP-MON	N/A	Revise deviation limit, indicator, and frequency on OP-MON form for CAM for consistency with monitoring approved in permit 47256 for same sources.
11	MS-C	No	CAT1-SEP19	OP-MON	N/A	Revise deviation limit, indicator, and frequency on OP-MON form for CAM for consistency with monitoring approved in permit 47256 for same sources.
12	MS-C	No	CAT2-SEP20	OP-MON	N/A	Revise deviation limit, indicator, and frequency on OP-MON form for CAM for consistency with monitoring approved in permit 47256 for same sources.
13	MS-C	No	CAT3-SEP21	OP-MON	N/A	Revise deviation limit, indicator, and frequency on OP-MON form for CAM for consistency with monitoring approved in permit 47256 for same sources.
14	MS-C	No	CAT3-SEP22	OP-MON	N/A	Revise deviation limit, indicator, and frequency on OP-MON form for CAM for consistency with monitoring approved in permit 47256 for same sources.
15	MS-C	No	CFHU-SEP	OP-MON	N/A	Revise deviation limit, indicator, and frequency on OP-MON form for CAM for consistency with monitoring approved in permit 47256 for same sources.
16	MS-C	No	COKR-SEP	OP-MON	N/A	Revise deviation limit, indicator, and frequency on OP-MON form for CAM for consistency with monitoring approved in permit 47256 for same sources.
17	MS-C	No	DDU-SEP	OP-MON	N/A	Revise deviation limit, indicator, and frequency on OP-MON form for CAM for consistency with monitoring approved in permit 47256 for same sources.
18	MS-C	No	ENVFP-SEP	OP-MON	N/A	Revise deviation limit, indicator, and frequency on OP-MON form for CAM for consistency with monitoring approved in permit 47256 for same sources.
19	MS-C	No	HRU-OWS	OP-MON	N/A	Revise deviation limit, indicator, and frequency on OP-MON form for CAM for consistency with monitoring approved in permit 47256 for same sources.
20	MS-C	No	ISOM-SEP1	OP-MON	N/A	Revise deviation limit, indicator, and frequency on OP-MON form for CAM for consistency with monitoring approved in permit 47256 for same sources.
21	MS-C	No	ISOM-SEP2	OP-MON	N/A	Revise deviation limit, indicator, and frequency on OP-MON form for CAM for consistency with monitoring approved in permit 47256 for same sources.



Texas Commission on Environmental Quality
Federal Operating Permit Program
Application for Permit Revision/Renewal
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I. DESCRIPTION OF REVISION						
Revision No.	Revision Code	Unit/Group/Process			NSR Authorization	Description of Changes and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
22	MS-C	No	LAB DWS	OP-MON	N/A	Revise deviation limit, indicator, and frequency on OP-MON form for CAM for consistency with monitoring approved in permit 47256 for same sources.
23	MS-C	No	NDU-OWS	OP-MON	N/A	Revise deviation limit, indicator, and frequency on OP-MON form for CAM for consistency with monitoring approved in permit 47256 for same sources.
24	MS-C	No	PS3A-OWS	OP-MON	N/A	Revise deviation limit, indicator, and frequency on OP-MON form for CAM for consistency with monitoring approved in permit 47256 for same sources.
25	MS-C	No	PS3B-SEP1	OP-MON	N/A	Revise deviation limit, indicator, and frequency on OP-MON form for CAM for consistency with monitoring approved in permit 47256 for same sources.
26	MS-C	No	PS3B-SEP2	OP-MON	N/A	Revise deviation limit, indicator, and frequency on OP-MON form for CAM for consistency with monitoring approved in permit 47256 for same sources.
27	MS-C	No	RDU-SEP	OP-MON	N/A	Revise deviation limit, indicator, and frequency on OP-MON form for CAM for consistency with monitoring approved in permit 47256 for same sources.
28	MS-C	No	RHU-SEP1	OP-MON	N/A	Revise deviation limit, indicator, and frequency on OP-MON form for CAM for consistency with monitoring approved in permit 47256 for same sources.
29	MS-C	No	RHU-SEP2	OP-MON	N/A	Revise deviation limit, indicator, and frequency on OP-MON form for CAM for consistency with monitoring approved in permit 47256 for same sources.
30	MS-C	No	ULCARU-SEP4	OP-MON	N/A	Revise deviation limit, indicator, and frequency on OP-MON form for CAM for consistency with monitoring approved in permit 47256 for same sources.
31	MS-C	No	ULC-SEP7	OP-MON	N/A	Revise deviation limit, indicator, and frequency on OP-MON form for CAM for consistency with monitoring approved in permit 47256 for same sources.
32	MS-C	No	UU3-SEP12	OP-MON	N/A	Revise deviation limit, indicator, and frequency on OP-MON form for CAM for consistency with monitoring approved in permit 47256 for same sources.
33	MS-C	No	UU3W OWS	OP-MON	N/A	Revise deviation limit, indicator, and frequency on OP-MON form for CAM for consistency with monitoring approved in permit 47256 for same sources.



**Texas Commission on Environmental Quality
Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2**

Table 2

Date: 5/16/2011	Permit No.: O1541	Account No.: GB-0004-L	Regulated Entity No.: RN102535077
Area Name: Texas City Refinery		Company Name: BP Products North America, Inc.	Customer Reference No.: CN600866800

I. DESCRIPTION OF REVISION						
Revision No.	Revision Code	Unit/Group/Process			NSR Authorization	Description of Changes and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
34	MS-C	No	UU4-SEP1	OP-MON	N/A	Revise deviation limit, indicator, and frequency on OP-MON form for CAM for consistency with monitoring approved in permit 47256 for same sources.
35	MS-C	No	ALK3 C1001	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
36	MS-C	No	ALKY2 C101	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
37	MS-C	No	ALKY2 C102	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
38	MS-C	No	ALKY2 C601	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
39	MS-C	No	ALKY2 C602	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
40	MS-C	No	ARU 610-E	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
41	MS-C	No	ARU 611-E	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
42	MS-C	No	ARU 612-E	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
43	MS-C	No	ARU 612-EB	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
44	MS-C	No	AU2 D-601	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
45	MS-C	No	AU2 E-610	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.



Texas Commission on Environmental Quality
Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2
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Date: 5/16/2011	Permit No.: O1541	Account No.: GB-0004-L	Regulated Entity No.: RN102535077
Area Name: Texas City Refinery	Company Name: BP Products North America, Inc.		Customer Reference No.: CN600866800

I. DESCRIPTION OF REVISION						
Revision No.	Revision Code	Unit/Group/Process			NSR Authorization	Description of Changes and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
46	MS-C	No	AU2 E-620	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
47	MS-C	No	AU2 E-630	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
48	MS-C	No	COKERAE101	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
49	MS-C	No	COKERAE403	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
50	MS-C	No	COKERBE201	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
51	MS-C	No	COKERBE403	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
52	MS-C	No	COKERCE301	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
53	MS-C	No	COKERCE403	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
54	MS-C	No	COKR-B201	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
55	MS-C	No	COKR-B203	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
56	MS-C	No	COKR-B301	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
57	MS-C	No	COKR-B302	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.



Texas Commission on Environmental Quality
Federal Operating Permit Program
Application for Permit Revision/Renewal
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Area Name: Texas City Refinery		Company Name: BP Products North America, Inc.	Customer Reference No.: CN600866800

I. DESCRIPTION OF REVISION						
Revision No.	Revision Code	Unit/Group/Process			NSR Authorization	Description of Changes and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
58	MS-C	No	FCCU1 D-1	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
59	MS-C	No	FCCU1 F-17	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
60	MS-C	No	FCCU3 401D	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
61	MS-C	No	FCCU3 405-E	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
62	MS-C	No	FCCU3 407-E	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
63	MS-C	No	FCCU3 505-E	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
64	MS-C	No	FCCU3 506-E	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
65	MS-C	No	FCU2	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
66	MS-C	No	HRU 810-C	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
67	MS-C	No	PS3A 201-E	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
68	MS-C	No	PS3A 202-E	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
69	MS-C	No	PS3A 204-F	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.



Texas Commission on Environmental Quality
Federal Operating Permit Program
Application for Permit Revision/Renewal
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Table 2

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Area Name: Texas City Refinery		Company Name: BP Products North America, Inc.	Customer Reference No.: CN600866800

I. DESCRIPTION OF REVISION						
Revision No.	Revision Code	Unit/Group/Process			NSR Authorization	Description of Changes and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
70	MS-C	No	PS3A 376-F	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
71	MS-C	No	PS3B-402BF	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
72	MS-C	No	RDU 602-F	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
73	MS-C	No	REF-FUG	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
74	MS-C	No	RHU 603-E	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
75	MS-C	No	RHU 604-E	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
76	MS-C	No	RHU 605-E	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
77	MS-C	No	TCH-3	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
78	MS-C	No	TCH-3	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
79	MS-C	No	ULC 100-D	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
80	MS-C	No	ULC 101-D	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
81	MS-C	No	ULC 102-D	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.



Texas Commission on Environmental Quality
Federal Operating Permit Program
Application for Permit Revision/Renewal
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Area Name: Texas City Refinery		Company Name: BP Products North America, Inc.	Customer Reference No.: CN600866800

I. DESCRIPTION OF REVISION						
Revision No.	Revision Code	Unit/Group/Process			NSR Authorization	Description of Changes and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
82	MS-C	No	ULC 102-E	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
83	MS-C	No	ULC 103-E	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
84	MS-C	No	ULC 104-E	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
85	MS-C	No	ULC 105-E	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
86	MS-C	No	ULC 106-E	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
87	MS-C	No	ULC 107-E	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
88	MS-C	No	ULC 108-E	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
89	MS-C	No	UU3 301-D	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
90	MS-C	No	UU3 302-D	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
91	MS-C	No	UU3 303-D	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
92	MS-C	No	UU3 303-E	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
93	MS-C	No	UU3 304-D	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.



Texas Commission on Environmental Quality
Federal Operating Permit Program
Application for Permit Revision/Renewal
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Area Name: Texas City Refinery		Company Name: BP Products North America, Inc.	Customer Reference No.: CN600866800

I. DESCRIPTION OF REVISION						
Revision No.	Revision Code	Unit/Group/Process		Applicable Form	NSR Authorization	Description of Changes and Provisional Terms and Conditions
		New Unit	ID No.			
94	MS-C	No	UU3 305-D	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
95	MS-C	No	UU3 305-E	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
96	MS-C	No	UU3 306-D	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
97	MS-C	No	UU3 307-E	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
98	MS-C	No	UU3 310-E	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
99	MS-C	No	UU3 311-E	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
100	MS-C	No	UU4 D-401	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
101	MS-C	No	UU4 D-402	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
102	MS-C	No	UU4 D-403	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
103	MS-C	No	UU4 D-404	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
104	MS-C	No	UU4 D-405	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
105	MS-C	No	UU4 D-406	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.



Texas Commission on Environmental Quality
Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2
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Area Name: Texas City Refinery	Company Name: BP Products North America, Inc.		Customer Reference No.: CN600866800

I. DESCRIPTION OF REVISION						
Revision No.	Revision Code	Unit/Group/Process			NSR Authorization	Description of Changes and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
106	MS-C	No	UU4 E-404	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
107	MS-C	No	UU4 E-405	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.
108	MS-C	No	UU4 E-408	OP-SUMR	N/A	Revise NSR Authorization Reference for this source.



Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
Table 1

Date: 5/16/2011	Regulated Entity No.: RN102535077	Permit No.: O1541
Company Name: BP Products North America, Inc.		Area Name: Texas City Refinery

Unit/Process						Preconstruction Authorizations	
AI	Revision No.	ID No.	Applicable Form	Name/Description	CAM	30 TAC Chapter 116/ 30 TAC Chapter 106	Title 1
D	1	TCH-1	OP-UA7	FLARE #1		47256	
	35	ALK3 C1001	OP-UA1	ALKY3 DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	36	ALKY2 C101	OP-UA1	ALKY2 DISTILLATION COLUMN		47256	
	37	ALKY2 C102	OP-UA1	ALKY2 DISTILLATION COLUMN		47256	
	38	ALKY2 C601	OP-UA1	ALKY2 DISTILLATION COLUMN		47256	
	39	ALKY2 C602	OP-UA1	ALKY2 DISTILLATION COLUMN		47256	
	40	ARU 610-E	OP-UA1	ARU DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	41	ARU 611-E	OP-UA1	ARU DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	42	ARU 612-E	OP-UA1	ARU DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2



Texas Commission on Environmental Quality
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Date: 5/16/2011	Regulated Entity No.: RN102535077	Permit No.: O1541
Company Name: BP Products North America, Inc.		Area Name: Texas City Refinery

Unit/Process						Preconstruction Authorizations	
AI	Revision No.	ID No.	Applicable Form	Name/Description	CAM	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
	43	ARU 612-EB	OP-UA1	ARU DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	44	AU2 D-601	OP-UA1	AU2 REACTOR		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	45	AU2 E-610	OP-UA1	AU2 DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	46	AU2 E-620	OP-UA1	AU2 DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	47	AU2 E-630	OP-UA1	AU2 DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	48	COKERAE101	OP-UA1	COKER A DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2



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Unit/Process						Preconstruction Authorizations	
AI	Revision No.	ID No.	Applicable Form	Name/Description	CAM	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
	49	COKERAE403	OP-UA1	COKER A DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	50	COKERBE201	OP-UA1	COKER B DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	51	COKERBE403	OP-UA1	COKER B DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	52	COKERCE301	OP-UA1	COKER C DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	53	COKERCE403	OP-UA1	COKER C DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	54	COKR-B201	OP-UA5	COKER FURNACES		2315, 83422, 106.261/11/01/2003	



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Company Name: BP Products North America, Inc.		Area Name: Texas City Refinery

Unit/Process						Preconstruction Authorizations	
AI	Revision No.	ID No.	Applicable Form	Name/Description	CAM	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
	55	COKR-B203	OP-UA5	HEATER B-203		6592, 106.261/11/01/2003	
	56	COKR-B301	OP-UA5	HEATER B-301		2315, 106.261/11/01/2003, 87463	
	57	COKR-B302	OP-UA5	COKER FEED PREHEATER		47256, 106.261/11/01/2003	
	58	FCCU1 D-1	OP-UA1	FCCU1 REACTOR		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	59	FCCU1 F-17	OP-UA1	FCCU1 DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	60	FCCU3 401D	OP-UA1	FCCU3 REACTOR		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	61	FCCU3 405-E	OP-UA1	FCCU3 DISTILLATION COLUMN		47256	
	62	FCCU3 407-E	OP-UA1	FCCU3 DISTILLATION COLUMN		47256	
	63	FCCU3 505-E	OP-UA1	FCCU3 DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2



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Company Name: BP Products North America, Inc.		Area Name: Texas City Refinery

Unit/Process						Preconstruction Authorizations	
AI	Revision No.	ID No.	Applicable Form	Name/Description	CAM	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
	64	FCCU3 506-E	OP-UA1	FCCU3 DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	65	FCU2	OP-UA50	FCU2		47256	
	66	HRU 810-C	OP-UA1	HRU DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	67	PS3A 201-E	OP-UA1	PS3A DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	68	PS3A 202-E	OP-UA1	PS3A DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2



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Unit/Process						Preconstruction Authorizations	
AI	Revision No.	ID No.	Applicable Form	Name/Description	CAM	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
	69	PS3A 204-F	OP-UA1	PS3A DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	70	PS3A 376-F	OP-UA1	PS3A DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	71	PS3B-402BF	OP-UA5	PIPESTILL 3B HEATER		19599	PSDTX023,
	72	RDU 602-F	OP-UA1	RDU DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	73	REF-FUG	OP-UA12	PLANT WIDE REFINERY FUGITIVES		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	74	RHU 603-E	OP-UA1	RHU DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2



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Company Name: BP Products North America, Inc.		Area Name: Texas City Refinery

Unit/Process						Preconstruction Authorizations	
AI	Revision No.	ID No.	Applicable Form	Name/Description	CAM	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
	75	RHU 604-E	OP-UA1	RHU DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	76	RHU 605-E	OP-UA1	RHU DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	77	TCH-3	OP-UA7	COMMON VENT TO FLARE TCH-3		47256, 86558	
	78	TCH-3	OP-UA7	FLARE #3		47256, 86558	
	79	ULC 100-D	OP-UA1	ULC REACTOR		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	80	ULC 101-D	OP-UA1	ULC REACTOR		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	81	ULC 102-D	OP-UA1	ULC REACTOR		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2



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Company Name: BP Products North America, Inc.		Area Name: Texas City Refinery

Unit/Process						Preconstruction Authorizations	
AI	Revision No.	ID No.	Applicable Form	Name/Description	CAM	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
	82	ULC 102-E	OP-UA1	ULC DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	83	ULC 103-E	OP-UA1	ULC DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	84	ULC 104-E	OP-UA1	ULC DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	85	ULC 105-E	OP-UA1	ULC DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	86	ULC 106-E	OP-UA1	ULC DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	87	ULC 107-E	OP-UA1	ULC DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2



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Individual Unit Summary for Revisions
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Table 1

Date: 5/16/2011	Regulated Entity No.: RN102535077	Permit No.: O1541
Company Name: BP Products North America, Inc.		Area Name: Texas City Refinery

Unit/Process						Preconstruction Authorizations	
AI	Revision No.	ID No.	Applicable Form	Name/Description	CAM	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
	88	ULC 108-E	OP-UA1	ULC DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	89	UU3 301-D	OP-UA1	UU3 REACTOR		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	90	UU3 302-D	OP-UA1	UU3 REACTOR		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	91	UU3 303-D	OP-UA1	UU3 REACTOR		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	92	UU3 303-E	OP-UA1	UU3 DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	93	UU3 304-D	OP-UA1	UU3 REACTOR		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	94	UU3 305-D	OP-UA1	UU3 REACTOR		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	95	UU3 305-E	OP-UA1	UU3 DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2



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Company Name: BP Products North America, Inc.		Area Name: Texas City Refinery

Unit/Process						Preconstruction Authorizations	
AI	Revision No.	ID No.	Applicable Form	Name/Description	CAM	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
	96	UU3 306-D	OP-UA1	UU3 REACTOR		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	97	UU3 307-E	OP-UA1	UU3 DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	98	UU3 310-E	OP-UA1	UU3 DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	99	UU3 311-E	OP-UA1	UU3 DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	100	UU4 D-401	OP-UA1	UU4 REACTOR		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	101	UU4 D-402	OP-UA1	UU4 REACTOR		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	102	UU4 D-403	OP-UA1	UU4 REACTOR		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	103	UU4 D-404	OP-UA1	UU4 REACTOR		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2



Texas Commission on Environmental Quality
Federal Operating Permit Program
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Date: 5/16/2011	Regulated Entity No.: RN102535077	Permit No.: O1541
Company Name: BP Products North America, Inc.		Area Name: Texas City Refinery

Unit/Process						Preconstruction Authorizations	
AI	Revision No.	ID No.	Applicable Form	Name/Description	CAM	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
	104	UU4 D-405	OP-UA1	UU4 REACTOR		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	105	UU4 D-406	OP-UA1	UU4 REACTOR		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	106	UU4 E-404	OP-UA1	UU4 DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	107	UU4 E-405	OP-UA1	UU4 DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2
	108	UU4 E-408	OP-UA1	UU4 DISTILLATION COLUMN		19599, 2315, 2612, 46052, 47256, 6488, 6592, 83422, 84210, 84658, 106.261/09/04/2000, 106.261/11/01/2003, 106.262/11/01/2003,	PSDTX023, PSDTX402M2



Texas Commission on Environmental Quality
Form OP-REQ2
Negative Applicable Requirement Determinations
Federal Operating Permit Program

Date: 5/16/2011	Regulated Entity No.: RN102535077	Permit No.: O1541
Company Name: BP Products North America, Inc.		Area Name: Texas City Refinery

Unit/ID	Revision No.	Unit/Group/Process		Potentially Applicable Regulatory Name	Negative Applicability Citation	Negative Applicability Reason
		ID No.	Applicable Form			
D	2	TCH-SRUAB	OP-UA50	NSPS Ja	60.100a(a)	Flare which commenced construction, modification, or reconstruction prior to June 24, 2008.
A	2	TCH-SRUAB	OP-UA50	NSPS Ja	60.100a(a)	Flare does not combust refinery fuel gas in normal operations.
A	2	TCH-SRUAB	OP-UA50	NSPS J	60.100(a)	Flare does not combust refinery fuel gas in normal operations.
D	3	TCH-SRUCD	OP-UA50	NSPS Ja	60.100a(a)	Flare which commenced construction, modification, or reconstruction prior to June 24, 2008.
A	3	TCH-SRUCD	OP-UA50	NSPS Ja	60.100a(a)	Flare does not combust refinery fuel gas in normal operations.
A	3	TCH-SRUCD	OP-UA50	NSPS J	60.100(a)	Flare does not combust refinery fuel gas in normal operations.
D	4	TCH-SW	OP-UA50	NSPS Ja	60.100a(a)	Flare which commenced construction, modification, or reconstruction prior to June 24, 2008.
A	4	TCH-SW	OP-UA50	NSPS Ja	60.100a(a)	Flare does not combust refinery fuel gas in normal operations.
A	4	TCH-SW	OP-UA50	NSPS J	60.100(a)	Flare does not combust refinery fuel gas in normal operations.
A	5	TCH-SRUAB	OP-UA15	MACT CC	63.641	Flare does not control miscellaneous process vent, as defined in 63.641.
A	6	TCH-SRUCD	OP-UA15	MACT CC	63.641	Flare does not control miscellaneous process vent, as defined in 63.641.
A	7	TCH-SW	OP-UA15	MACT CC	63.641	Flare does not control miscellaneous process vent, as defined in 63.641.



Texas Commission on Environmental Quality
Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 38)
Federal Operating Permit Program

Date: 05/16/2011	RN No.: 102535077	Permit No.: O1541
Area Name: Texas City Refinery		

For SOP applications, answer ALL questions unless otherwise directed.

◆ *For GOP applications, answer ONLY these questions unless otherwise directed.*

XI. MISCELLANEOUS			
A. Requirements Reference Tables (RRT) and Flowcharts	YES	NO	N/A
1. The application area contains units that are potentially subject to a regulation for which the TCEQ has not developed an RRT and flowchart.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
B. Forms	YES	NO	N/A
◆ 1. The application area contains units that are potentially subject to a regulation for which the TCEQ has not developed a unit attribute form. <i>If the response to Question XI.B.1 is "NO" or "N/A", go to Section XI.C.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
◆ 2. Provide the Part and Subpart designation for the federal rule(s) or the Chapter, Subchapter and Division designation for the State regulation(s) in the space provided below.			
40 CFR Part 63 Subpart UUU, 40 CFR Part 63 Subpart GGGGG, 40 CFR Part 60 Subpart GGGa			
C. Emission Limitation Certifications	YES	NO	N/A
◆ 1. The application area includes units for which federally enforceable emission limitations have been established by certification.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D. Alternative Means of Control, Alternative Emission Limitation or Standard, or Equivalent Requirements	YES	NO	N/A
1. The application area is located at a <u>site</u> that is subject to a site specific requirement of the state implementation plan (SIP).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. The application area includes <u>units</u> located at the site that are subject to a site specific requirement of the SIP.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. The application area includes units which demonstrate compliance by using an alternative means of control, alternative emission limitation or standard or equivalent requirements approved by the EPA Administrator.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
E. Title IV - Acid Rain Program	YES	NO	N/A
1. The application area includes emission units subject to the Acid Rain Program (ARP), including the Opt-In Program.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. The application area includes emission units qualifying for the new unit exemption under 40 CFR § 72.7	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. The application area includes emission units qualifying for the retired unit exemption under 40 CFR § 72.8.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION			
A. Account No.:	GB-0004-L	B. RN No.:	RN102535077
C. CN No.:	CN600866800		
D. Permit No.:	O1541	E. Project No.:	13408
F. Area Name:	Texas City Refinery		
G. Company Name: BP Products North America, Inc.			
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION			
A. Revision No.:	9	B. Unit/EPN/Group/Process ID No.:	ARU-SEP
C. Applicable Form:	OP-UA14		
III. APPLICABLE REGULATORY REQUIREMENT			
A. Name:	Chapter 115		B. SOP Index No.:
		R5131-0010	
C. Pollutant:	VOC	D. Main Standard:	115.132(a)(3)
E. Monitoring Type:	CAM		F. Unit Size:
		LG	
G. Deviation Limit:	Any instance when the carbon is not changed out within 24-hours of receiving sampling results that indicate breakthrough has occurred (100 ppm VOC)		
IV. CONTROL DEVICE INFORMATION			
A. Device ID No.:	W10		B. Device Type:
		CRBAD2	
V. CAM CASE-BY-CASE			
A. Indicator:	VOC breakthrough as indicated by a sample result greater than or equal to 100 ppm VOC	B. Minimum Frequency:	Once per week
C. Averaging Period:	N/A		
D. QA/QC Procedures:	On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.		
E. Verification Procedures:	VOC sampling and analysis shall be by photo-ionization detector (PID), Ultrarray, or a TCEQ equivalent as approved by the Compliance Support Division.		
F. Representative Data:	Samples should be taken between the beds of the dual-bed system.		
VI. PERIODIC MONITORING CASE-BY-CASE			
A. Indicator:	B. Minimum Frequency:		C. Averaging Period:
D. Periodic Monitoring Text:			

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:

TCEQ-10421 [11/04]

Form OP-MON - This form for use by facilities subject to air quality permit requirements and may be revised periodically [APDG 5234v3]

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Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION			
A. Account No.:	GB-0004-L	B. RN No.:	RN102535077
D. Permit No.:	O1541	E. Project No.:	13408
C. CN No.: CN600866800			
F. Area Name: Texas City Refinery			
G. Company Name: BP Products North America, Inc.			
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION			
A. Revision No.:	10	B. Unit/EPN/Group/Process ID No.:	AU2-SEP
		C. Applicable Form:	OP-UA14
III. APPLICABLE REGULATORY REQUIREMENT			
A. Name:	Chapter 115		B. SOP Index No.:
C. Pollutant:	VOC	D. Main Standard:	115.132(a)(3)
E. Monitoring Type:	CAM		F. Unit Size:
G. Deviation Limit:	Any instance when the carbon is not changed out within 24-hours of receiving sampling results that indicate breakthrough has occurred (100 ppm VOC)		
IV. CONTROL DEVICE INFORMATION			
A. Device ID No.:	W21		B. Device Type:
		CRBAD2	
V. CAM CASE-BY-CASE			
A. Indicator:	VOC breakthrough as indicated by a sample result greater than or equal to 100 ppm VOC		
B. Minimum Frequency:	Once per week		
C. Averaging Period:	N/A		
D. QA/QC Procedures:	On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.		
E. Verification Procedures:	VOC sampling and analysis shall be by photo-ionization detector (PID), Ultraray, or a TCEQ equivalent as approved by the Compliance Support Division.		
F. Representative Data:	Samples should be taken between the beds of the dual-bed system.		
VI. PERIODIC MONITORING CASE-BY-CASE			
A. Indicator:	B. Minimum Frequency:		C. Averaging Period:
D. Periodic Monitoring Text:			

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:		B.	Device ID No.:	C. Device Type:
2	A. Unit ID No.:		B.	Device ID No.:	C. Device Type:
3	A. Unit ID No.:		B.	Device ID No.:	C. Device Type:
4	A. Unit ID No.:		B.	Device ID No.:	C. Device Type:
5	A. Unit ID No.:		B.	Device ID No.:	C. Device Type:
6	A. Unit ID No.:		B.	Device ID No.:	C. Device Type:
7	A. Unit ID No.:		B.	Device ID No.:	C. Device Type:

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Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION			
A. Account No.:	GB-0004-L	B. RN No.:	RN102535077
C. CN No.:	CN600866800	D. Permit No.:	O1541
E. Project No.:	13408	F. Area Name:	Texas City Refinery
G. Company Name: BP Products North America, Inc.			
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION			
A. Revision No.:	11	B. Unit/EPN/Group/Process ID No.:	CAT1-SEP19
		C. Applicable Form:	OP-UA14
III. APPLICABLE REGULATORY REQUIREMENT			
A. Name:	Chapter 115		B. SOP Index No.:
C. Pollutant:	VOC	D. Main Standard:	115.132(a)(3)
E. Monitoring Type:	CAM	F. Unit Size:	LG
G. Deviation Limit:	Any instance when the carbon is not changed out within 24-hours of receiving sampling results that indicate breakthrough has occurred (100 ppm VOC)		
IV. CONTROL DEVICE INFORMATION			
A. Device ID No.:	E01	B. Device Type:	CRBAD2
V. CAM CASE-BY-CASE			
A. Indicator:	VOC breakthrough as indicated by a sample result greater than or equal to 100 ppm VOC		
B. Minimum Frequency:	Once per week		
C. Averaging Period:	N/A		
D. QA/QC Procedures:	On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.		
E. Verification Procedures:	VOC sampling and analysis shall be by photo-ionization detector (PID), Ultraray, or a TCEQ equivalent as approved by the Compliance Support Division.		
F. Representative Data:	Samples should be taken between the beds of the dual-bed system.		
VI. PERIODIC MONITORING CASE-BY-CASE			
A. Indicator:	B. Minimum Frequency:		C. Averaging Period:
D. Periodic Monitoring Text:			

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:		B.	Device ID No.:	
2	A. Unit ID No.:		C.	Device Type:	
3	A. Unit ID No.:		B.	Device ID No.:	
4	A. Unit ID No.:		C.	Device Type:	
5	A. Unit ID No.:		B.	Device ID No.:	
6	A. Unit ID No.:		C.	Device Type:	
7	A. Unit ID No.:		B.	Device ID No.:	
			C.	Device Type:	

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Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION			
A. Account No.: GB-0004-L	B. RN No.: RN102535077	C. CN No.: CN600866800	
D. Permit No.: O1541	E. Project No.: 13408	F. Area Name: Texas City Refinery	
G. Company Name: BP Products North America, Inc.			
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION			
A. Revision No.: 12	B. Unit/EPN/Group/Process ID No.: CAT2-SEP20	C. Applicable Form: OP-UA14	
III. APPLICABLE REGULATORY REQUIREMENT			
A. Name: Chapter 115	B. SOP Index No.: R5131-0010		
C. Pollutant: VOC	D. Main Standard: 115.132(a)(3)		
E. Monitoring Type: CAM	F. Unit Size: LG		
G. Deviation Limit: Any instance when the carbon is not changed out within 24-hours of receiving sampling results that indicate breakthrough has occurred (100 ppm VOC)			
IV. CONTROL DEVICE INFORMATION			
A. Device ID No.: E08	B. Device Type: CRBAD2		
V. CAM CASE-BY-CASE			
A. Indicator: VOC breakthrough as indicated by a sample result greater than or equal to 100 ppm VOC	B. Minimum Frequency: Once per week	C. Averaging Period: N/A	
D. QA/QC Procedures:	On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.		
E. Verification Procedures:	VOC sampling and analysis shall be by photo-ionization detector (PID), Ultraray, or a TCEQ equivalent as approved by the Compliance Support Division.		
F. Representative Data:	Samples should be taken between the beds of the dual-bed system.		
VI. PERIODIC MONITORING CASE-BY-CASE			
A. Indicator:	B. Minimum Frequency:	C. Averaging Period:	
D. Periodic Monitoring Text:			

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:

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Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION			
A. Account No.:	GB-0004-L	B. RN No.:	RN102535077
C. CN No.:	CN600866800		
D. Permit No.:	O1541	E. Project No.:	13408
F. Area Name:	Texas City Refinery		
G. Company Name:	BP Products North America, Inc.		
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION			
A. Revision No.:	13	B. Unit/EPN/Group/Process ID No.:	CAT3-SEP21
C. Applicable Form:	OP-UA14		
III. APPLICABLE REGULATORY REQUIREMENT			
A. Name:	Chapter 115		B. SOP Index No.:
C. Pollutant:	VOC	D. Main Standard:	115.132(a)(3)
E. Monitoring Type:	CAM	F. Unit Size:	LG
G. Deviation Limit:	Any instance when the carbon is not changed out within 24-hours of receiving sampling results that indicate breakthrough has occurred (100 ppm VOC)		
IV. CONTROL DEVICE INFORMATION			
A. Device ID No.:	E06	B. Device Type:	CRBAD2
V. CAM CASE-BY-CASE			
A. Indicator:	VOC breakthrough as indicated by a sample result greater than or equal to 100 ppm VOC	B. Minimum Frequency:	Once per week
C. Averaging Period:	N/A		
D. QA/QC Procedures:	On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.		
E. Verification Procedures:	VOC sampling and analysis shall be by photo-ionization detector (PID), Ultraray, or a TCEQ equivalent as approved by the Compliance Support Division.		
F. Representative Data:	Samples should be taken between the beds of the dual-bed system.		
VI. PERIODIC MONITORING CASE-BY-CASE			
A. Indicator:		B. Minimum Frequency:	
C. Averaging Period:			
D. Periodic Monitoring Text:			

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:

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Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION			
A. Account No.:	GB-0004-L	B. RN No.:	RN102535077
C. CN No.:	CN600866800		
D. Permit No.:	O1541	E. Project No.:	13408
F. Area Name:	Texas City Refinery		
G. Company Name:	BP Products North America, Inc.		
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION			
A. Revision No.:	14	B. Unit/EPN/Group/Process ID No.:	CAT3-SEP22
C. Applicable Form:	OP-UA14		
III. APPLICABLE REGULATORY REQUIREMENT			
A. Name:	Chapter 115		B. SOP Index No.:
C. Pollutant:	VOC	D. Main Standard:	115.132(a)(3)
E. Monitoring Type:	CAM		F. Unit Size:
G. Deviation Limit:	Any instance when the carbon is not changed out within 24-hours of receiving sampling results that indicate breakthrough has occurred (100 ppm VOC)		
IV. CONTROL DEVICE INFORMATION			
A. Device ID No.:	E13	B. Device Type:	CRBAD2
V. CAM CASE-BY-CASE			
A. Indicator:	VOC breakthrough as indicated by a sample result greater than or equal to 100 ppm VOC	B. Minimum Frequency:	Once per week
C. Averaging Period:	N/A		
D. QA/QC Procedures:	On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.		
E. Verification Procedures:	VOC sampling and analysis shall be by photo-ionization detector (PID), Ultraray, or a TCEQ equivalent as approved by the Compliance Support Division.		
F. Representative Data:	Samples should be taken between the beds of the dual-bed system.		
VI. PERIODIC MONITORING CASE-BY-CASE			
A. Indicator:		B. Minimum Frequency:	
C. Averaging Period:			
D. Periodic Monitoring Text:			

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:

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Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION			
A. Account No.:	GB-0004-L	B. RN No.:	RN102535077
C. CN No.:	CN600866800		
D. Permit No.:	O1541	E. Project No.:	13408
F. Area Name:	Texas City Refinery		
G. Company Name:	BP Products North America, Inc.		
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION			
A. Revision No.:	15	B. Unit/EPN/Group/Process ID No.:	CFHU-SEP
C. Applicable Form:	OP-UA14		
III. APPLICABLE REGULATORY REQUIREMENT			
A. Name:	Chapter 115	B. SOP Index No.:	R5131-0010
C. Pollutant:	VOC	D. Main Standard:	115.132(a)(3)
E. Monitoring Type:	CAM	F. Unit Size:	LG
G. Deviation Limit:	Any instance when the carbon is not changed out within 24-hours of receiving sampling results that indicate breakthrough has occurred (100 ppm VOC)		
IV. CONTROL DEVICE INFORMATION			
A. Device ID No.:	E35	B. Device Type:	CRBAD2
V. CAM CASE-BY-CASE			
A. Indicator:	VOC breakthrough as indicated by a sample result greater than or equal to 100 ppm VOC	B. Minimum Frequency:	Once per week
C. Averaging Period:	N/A		
D. QA/QC Procedures:	On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.		
E. Verification Procedures:	VOC sampling and analysis shall be by photo-ionization detector (PID), Ultraray, or a TCEQ equivalent as approved by the Compliance Support Division.		
F. Representative Data:	Samples should be taken between the beds of the dual-bed system.		
VI. PERIODIC MONITORING CASE-BY-CASE			
A. Indicator:		B. Minimum Frequency:	
C. Averaging Period:			
D. Periodic Monitoring Text:			

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:

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Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION			
A. Account No.:	GB-0004-L	B. RN No.:	RN102535077
C. CN No.:	CN600866800	D. Permit No.:	O1541
E. Project No.:	13408	F. Area Name:	Texas City Refinery
G. Company Name: BP Products North America, Inc.			
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION			
A. Revision No.:	16	B. Unit/EPN/Group/Process ID No.:	COKR-SEP
C. Applicable Form:		OP-UA14	
III. APPLICABLE REGULATORY REQUIREMENT			
A. Name:	Chapter 115	B. SOP Index No.:	R5131-0010
C. Pollutant:	VOC	D. Main Standard:	115.132(a)(3)
E. Monitoring Type:	CAM	F. Unit Size:	LG
G. Deviation Limit: Any instance when the carbon is not changed out within 24-hours of receiving sampling results that indicate breakthrough has occurred (100 ppm VOC)			
IV. CONTROL DEVICE INFORMATION			
A. Device ID No.:	E32	B. Device Type:	CRBAD2
V. CAM CASE-BY-CASE			
A. Indicator:	VOC breakthrough as indicated by a sample result greater than or equal to 100 ppm VOC	B. Minimum Frequency:	Once per week
C. Averaging Period:		N/A	
D. QA/QC Procedures:	On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.		
E. Verification Procedures:	VOC sampling and analysis shall be by photo-ionization detector (PID), Ultraray, or a TCEQ equivalent as approved by the Compliance Support Division.		
F. Representative Data:	Samples should be taken between the beds of the dual-bed system.		
VI. PERIODIC MONITORING CASE-BY-CASE			
A. Indicator:		B. Minimum Frequency:	
C. Averaging Period:			
D. Periodic Monitoring Text:			

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:

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Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION			
A. Account No.:	GB-0004-L	B. RN No.:	RN102535077
D. Permit No.:	O1541	E. Project No.:	13408
G. Company Name: BP Products North America, Inc.		F. Area Name: Texas City Refinery	
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION			
A. Revision No.:	17	B. Unit/EPN/Group/Process ID No.:	DDU-SEP
		C. Applicable Form: OP-UA14	
III. APPLICABLE REGULATORY REQUIREMENT			
A. Name:	Chapter 115	B. SOP Index No.:	R5131-0010
C. Pollutant:	VOC	D. Main Standard:	115.132(a)(3)
E. Monitoring Type:	CAM	F. Unit Size:	LG
G. Deviation Limit: Any instance when the carbon is not changed out within 24-hours of receiving sampling results that indicate breakthrough has occurred (100 ppm VOC)			
IV. CONTROL DEVICE INFORMATION			
A. Device ID No.:	W02	B. Device Type:	CRBAD2
V. CAM CASE-BY-CASE			
A. Indicator:	VOC breakthrough as indicated by a sample result greater than or equal to 100 ppm VOC	B. Minimum Frequency:	Once per week
		C. Averaging Period: N/A	
D. QA/QC Procedures:	On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.		
E. Verification Procedures:	VOC sampling and analysis shall be by photo-ionization detector (PID), Ultraray, or a TCEQ equivalent as approved by the Compliance Support Division.		
F. Representative Data:	Samples should be taken between the beds of the dual-bed system.		
VI. PERIODIC MONITORING CASE-BY-CASE			
A. Indicator:		B. Minimum Frequency:	
		C. Averaging Period:	
D. Periodic Monitoring Text:			

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:		B.	Device ID No.:	C. Device Type:
2	A. Unit ID No.:		B.	Device ID No.:	C. Device Type:
3	A. Unit ID No.:		B.	Device ID No.:	C. Device Type:
4	A. Unit ID No.:		B.	Device ID No.:	C. Device Type:
5	A. Unit ID No.:		B.	Device ID No.:	C. Device Type:
6	A. Unit ID No.:		B.	Device ID No.:	C. Device Type:
7	A. Unit ID No.:		B.	Device ID No.:	C. Device Type:

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Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION			
A. Account No.:	GB-0004-L	B. RN No.:	RN102535077
C. CN No.:	CN600866800	D. Permit No.:	O1541
E. Project No.:	13408	F. Area Name:	Texas City Refinery
G. Company Name: BP Products North America, Inc.			
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION			
A. Revision No.:	18	B. Unit/EPN/Group/Process ID No.:	ENVFP-SEP
C. Applicable Form:		OP-UA14	
III. APPLICABLE REGULATORY REQUIREMENT			
A. Name:	Chapter 115	B. SOP Index No.:	R5131-0010
C. Pollutant:	VOC	D. Main Standard:	115.132(a)(3)
E. Monitoring Type:	CAM	F. Unit Size:	LG
G. Deviation Limit: Any instance when the carbon is not changed out within 24-hours of receiving sampling results that indicate breakthrough has occurred (100 ppm VOC)			
IV. CONTROL DEVICE INFORMATION			
A. Device ID No.:	E61	B. Device Type:	CRBAD2
V. CAM CASE-BY-CASE			
A. Indicator:	VOC breakthrough as indicated by a sample result greater than or equal to 100 ppm VOC	B. Minimum Frequency:	Once per week
C. Averaging Period:		N/A	
D. QA/QC Procedures:	On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.		
E. Verification Procedures:	VOC sampling and analysis shall be by photo-ionization detector (PID), Ultraray, or a TCEQ equivalent as approved by the Compliance Support Division.		
F. Representative Data:	Samples should be taken between the beds of the dual-bed system.		
VI. PERIODIC MONITORING CASE-BY-CASE			
A. Indicator:		B. Minimum Frequency:	
C. Averaging Period:			
D. Periodic Monitoring Text:			

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:

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Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION			
A. Account No.:	GB-0004-L	B. RN No.:	RN102535077
C. CN No.:	CN600866800	D. Permit No.:	O1541
E. Project No.:	13408	F. Area Name:	Texas City Refinery
G. Company Name: BP Products North America, Inc.			
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION			
A. Revision No.:	19	B. Unit/EPN/Group/Process ID No.:	HRU-OWS
		C. Applicable Form:	OP-UA14
III. APPLICABLE REGULATORY REQUIREMENT			
A. Name:	Chapter 115	B. SOP Index No.:	R5131-0010
C. Pollutant:	VOC	D. Main Standard:	115.132(a)(3)
E. Monitoring Type:	CAM	F. Unit Size:	LG
G. Deviation Limit: Any instance when the carbon is not changed out within 24-hours of receiving sampling results that indicate breakthrough has occurred (100 ppm VOC)			
IV. CONTROL DEVICE INFORMATION			
A. Device ID No.:	E70	B. Device Type:	CRBAD2
V. CAM CASE-BY-CASE			
A. Indicator:	VOC breakthrough as indicated by a sample result greater than or equal to 100 ppm VOC	B. Minimum Frequency:	Once per week
		C. Averaging Period:	N/A
D. QA/QC Procedures:	On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.		
E. Verification Procedures:	VOC sampling and analysis shall be by photo-ionization detector (PID), Ultraray, or a TCEQ equivalent as approved by the Compliance Support Division.		
F. Representative Data:	Samples should be taken between the beds of the dual-bed system.		
VI. PERIODIC MONITORING CASE-BY-CASE			
A. Indicator:		B. Minimum Frequency:	
		C. Averaging Period:	
D. Periodic Monitoring Text:			

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:

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Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION		
A. Account No.: GB-0004-L	B. RN No.: RN102535077	C. CN No.: CN600866800
D. Permit No.: O1541	E. Project No.: 13408	F. Area Name: Texas City Refinery
G. Company Name: BP Products North America, Inc.		
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION		
A. Revision No.: 20	B. Unit/EPN/Group/Process ID No.: ISOM-SEP1	C. Applicable Form: OP-UA14
III. APPLICABLE REGULATORY REQUIREMENT		
A. Name: Chapter 115	B. SOP Index No.: R5131-0010	
C. Pollutant: VOC	D. Main Standard: 115.132(a)(3)	
E. Monitoring Type: CAM	F. Unit Size: LG	
G. Deviation Limit: Any instance when the carbon is not changed out within 24-hours of receiving sampling results that indicate breakthrough has occurred (100 ppm VOC)		
IV. CONTROL DEVICE INFORMATION		
A. Device ID No.: W16	B. Device Type: CRBAD2	
V. CAM CASE-BY-CASE		
A. Indicator: VOC breakthrough as indicated by a sample result greater than or equal to 100 ppm VOC	B. Minimum Frequency: Once per week	C. Averaging Period: N/A
D. QA/QC Procedures:	On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.	
E. Verification Procedures:	VOC sampling and analysis shall be by photo-ionization detector (PID), Ultraray, or a TCEQ equivalent as approved by the Compliance Support Division.	
F. Representative Data:	Samples should be taken between the beds of the dual-bed system.	
VI. PERIODIC MONITORING CASE-BY-CASE		
A. Indicator:	B. Minimum Frequency:	C. Averaging Period:
D. Periodic Monitoring Text:		

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:

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Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION			
A. Account No.:	GB-0004-L	B. RN No.:	RN102535077
C. CN No.:	CN600866800	D. Permit No.:	O1541
E. Project No.:	13408	F. Area Name:	Texas City Refinery
G. Company Name: BP Products North America, Inc.			
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION			
A. Revision No.:	21	B. Unit/EPN/Group/Process ID No.:	ISOM-SEP2
		C. Applicable Form:	OP-UA14
III. APPLICABLE REGULATORY REQUIREMENT			
A. Name:	Chapter 115	B. SOP Index No.:	R5131-0010
C. Pollutant:	VOC	D. Main Standard:	115.132(a)(3)
E. Monitoring Type:	CAM	F. Unit Size:	LG
G. Deviation Limit: Any instance when the carbon is not changed out within 24-hours of receiving sampling results that indicate breakthrough has occurred (100 ppm VOC)			
IV. CONTROL DEVICE INFORMATION			
A. Device ID No.:	W17	B. Device Type:	CRBAD2
V. CAM CASE-BY-CASE			
A. Indicator:	VOC breakthrough as indicated by a sample result greater than or equal to 100 ppm VOC	B. Minimum Frequency:	Once per week
		C. Averaging Period:	N/A
D. QA/QC Procedures:	On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.		
E. Verification Procedures:	VOC sampling and analysis shall be by photo-ionization detector (PID), Ultraray, or a TCEQ equivalent as approved by the Compliance Support Division.		
F. Representative Data:	Samples should be taken between the beds of the dual-bed system.		
VI. PERIODIC MONITORING CASE-BY-CASE			
A. Indicator:		B. Minimum Frequency:	
		C. Averaging Period:	
D. Periodic Monitoring Text:			

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:

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Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION			
A. Account No.:	GB-0004-L	B. RN No.:	RN102535077
C. CN No.:	CN600866800	D. Permit No.:	O1541
E. Project No.:	13408	F. Area Name:	Texas City Refinery
G. Company Name: BP Products North America, Inc.			
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION			
A. Revision No.:	22	B. Unit/EPN/Group/Process ID No.:	LAB DWS
		C. Applicable Form:	OP-UA14
III. APPLICABLE REGULATORY REQUIREMENT			
A. Name:	Chapter 115	B. SOP Index No.:	R5131-0010
C. Pollutant:	VOC	D. Main Standard:	115.132(a)(3)
E. Monitoring Type:	CAM	F. Unit Size:	LG
G. Deviation Limit: Any instance when the carbon is not changed out within 24-hours of receiving sampling results that indicate breakthrough has occurred (100 ppm VOC)			
IV. CONTROL DEVICE INFORMATION			
A. Device ID No.:	E68	B. Device Type:	CRBAD2
V. CAM CASE-BY-CASE			
A. Indicator:	VOC breakthrough as indicated by a sample result greater than or equal to 100 ppm VOC	B. Minimum Frequency:	Once per week
		C. Averaging Period:	N/A
D. QA/QC Procedures:	On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.		
E. Verification Procedures:	VOC sampling and analysis shall be by photo-ionization detector (PID), Ultraray, or a TCEQ equivalent as approved by the Compliance Support Division.		
F. Representative Data:	Samples should be taken between the beds of the dual-bed system.		
VI. PERIODIC MONITORING CASE-BY-CASE			
A. Indicator:		B. Minimum Frequency:	
		C. Averaging Period:	
D. Periodic Monitoring Text:			

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:

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Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION			
A. Account No.:	GB-0004-L	B. RN No.:	RN102535077
C. CN No.:	CN600866800		
D. Permit No.:	O1541	E. Project No.:	13408
F. Area Name:	Texas City Refinery		
G. Company Name: BP Products North America, Inc.			
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION			
A. Revision No.:	23	B. Unit/EPN/Group/Process ID No.:	NDU-OWS
C. Applicable Form:	OP-UA14		
III. APPLICABLE REGULATORY REQUIREMENT			
A. Name:	Chapter 115	B. SOP Index No.:	R5131-0010
C. Pollutant:	VOC	D. Main Standard:	115.132(a)(3)
E. Monitoring Type:	CAM	F. Unit Size:	LG
G. Deviation Limit: Any instance when the carbon is not changed out within 24-hours of receiving sampling results that indicate breakthrough has occurred (100 ppm VOC)			
IV. CONTROL DEVICE INFORMATION			
A. Device ID No.:	L-503	B. Device Type:	CRBAD2
V. CAM CASE-BY-CASE			
A. Indicator:	VOC breakthrough as indicated by a sample result greater than or equal to 100 ppm VOC	B. Minimum Frequency:	Once per week
C. Averaging Period:	N/A		
D. QA/QC Procedures:	On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.		
E. Verification Procedures:	VOC sampling and analysis shall be by photo-ionization detector (PID), Ultraray, or a TCEQ equivalent as approved by the Compliance Support Division.		
F. Representative Data:	Samples should be taken between the beds of the dual-bed system.		
VI. PERIODIC MONITORING CASE-BY-CASE			
A. Indicator:		B. Minimum Frequency:	
C. Averaging Period:			
D. Periodic Monitoring Text:			

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:

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Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION			
A. Account No.:	GB-0004-L	B. RN No.:	RN102535077
C. CN No.:	CN600866800		
D. Permit No.:	O1541	E. Project No.:	13408
F. Area Name:	Texas City Refinery		
G. Company Name:	BP Products North America, Inc.		
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION			
A. Revision No.:	24	B. Unit/EPN/Group/Process ID No.:	PS3A-OWS
C. Applicable Form:	OP-UA14		
III. APPLICABLE REGULATORY REQUIREMENT			
A. Name:	Chapter 115		B. SOP Index No.:
C. Pollutant:	VOC	D. Main Standard:	115.132(a)(3)
E. Monitoring Type:	CAM		F. Unit Size:
G. Deviation Limit:	Any instance when the carbon is not changed out within 24-hours of receiving sampling results that indicate breakthrough has occurred (100 ppm VOC)		
IV. CONTROL DEVICE INFORMATION			
A. Device ID No.:	E09	B. Device Type:	CRBAD2
V. CAM CASE-BY-CASE			
A. Indicator:	VOC breakthrough as indicated by a sample result greater than or equal to 100 ppm VOC		
B. Minimum Frequency:	Once per week		
C. Averaging Period:	N/A		
D. QA/QC Procedures:	On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.		
E. Verification Procedures:	VOC sampling and analysis shall be by photo-ionization detector (PID), Ultraray, or a TCEQ equivalent as approved by the Compliance Support Division.		
F. Representative Data:	Samples should be taken between the beds of the dual-bed system.		
VI. PERIODIC MONITORING CASE-BY-CASE			
A. Indicator:	B. Minimum Frequency:		C. Averaging Period:
D. Periodic Monitoring Text:			

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:

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Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION		
A. Account No.: GB-0004-L	B. RN No.: RN102535077	C. CN No.: CN600866800
D. Permit No.: O1541	E. Project No.: 13408	F. Area Name: Texas City Refinery
G. Company Name: BP Products North America, Inc.		
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION		
A. Revision No.: 25	B. Unit/EPN/Group/Process ID No.: PS3B-SEP1	C. Applicable Form: OP-UA14
III. APPLICABLE REGULATORY REQUIREMENT		
A. Name: Chapter 115	B. SOP Index No.: R5131-0010	
C. Pollutant: VOC	D. Main Standard: 115.132(a)(3)	
E. Monitoring Type: CAM	F. Unit Size: LG	
G. Deviation Limit: Any instance when the carbon is not changed out within 24-hours of receiving sampling results that indicate breakthrough has occurred (100 ppm VOC)		
IV. CONTROL DEVICE INFORMATION		
A. Device ID No.: E16	B. Device Type: CRBAD2	
V. CAM CASE-BY-CASE		
A. Indicator: VOC breakthrough as indicated by a sample result greater than or equal to 100 ppm VOC	B. Minimum Frequency: Once per week	C. Averaging Period: N/A
D. QA/QC Procedures:	On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.	
E. Verification Procedures:	VOC sampling and analysis shall be by photo-ionization detector (PID), Ultraray, or a TCEQ equivalent as approved by the Compliance Support Division.	
F. Representative Data:	Samples should be taken between the beds of the dual-bed system.	
VI. PERIODIC MONITORING CASE-BY-CASE		
A. Indicator:	B. Minimum Frequency:	C. Averaging Period:
D. Periodic Monitoring Text:		

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:

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Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION			
A. Account No.:	GB-0004-L	B. RN No.:	RN102535077
C. CN No.:	CN600866800		
D. Permit No.:	O1541	E. Project No.:	13408
F. Area Name:	Texas City Refinery		
G. Company Name: BP Products North America, Inc.			
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION			
A. Revision No.:	26	B. Unit/EPN/Group/Process ID No.:	PS3B-SEP2
C. Applicable Form:	OP-UA14		
III. APPLICABLE REGULATORY REQUIREMENT			
A. Name:	Chapter 115	B. SOP Index No.:	R5131-0010
C. Pollutant:	VOC	D. Main Standard:	115.132(a)(3)
E. Monitoring Type:	CAM	F. Unit Size:	LG
G. Deviation Limit: Any instance when the carbon is not changed out within 24-hours of receiving sampling results that indicate breakthrough has occurred (100 ppm VOC)			
IV. CONTROL DEVICE INFORMATION			
A. Device ID No.:	E14	B. Device Type:	CRBAD2
V. CAM CASE-BY-CASE			
A. Indicator:	VOC breakthrough as indicated by a sample result greater than or equal to 100 ppm VOC	B. Minimum Frequency:	Once per week
C. Averaging Period:	N/A		
D. QA/QC Procedures:	On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.		
E. Verification Procedures:	VOC sampling and analysis shall be by photo-ionization detector (PID), Ultraray, or a TCEQ equivalent as approved by the Compliance Support Division.		
F. Representative Data:	Samples should be taken between the beds of the dual-bed system.		
VI. PERIODIC MONITORING CASE-BY-CASE			
A. Indicator:		B. Minimum Frequency:	
C. Averaging Period:			
D. Periodic Monitoring Text:			

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:

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Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION			
A. Account No.:	GB-0004-L	B. RN No.:	RN102535077
D. Permit No.:	O1541	E. Project No.:	13408
F. Area Name: Texas City Refinery			
G. Company Name: BP Products North America, Inc.			
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION			
A. Revision No.:	27	B. Unit/EPN/Group/Process ID No.:	RDU-SEP
		C. Applicable Form: OP-UA14	
III. APPLICABLE REGULATORY REQUIREMENT			
A. Name:	Chapter 115	B. SOP Index No.:	R5131-0010
C. Pollutant:	VOC	D. Main Standard:	115.132(a)(3)
E. Monitoring Type:	CAM	F. Unit Size:	LG
G. Deviation Limit: Any instance when the carbon is not changed out within 24-hours of receiving sampling results that indicate breakthrough has occurred (100 ppm VOC)			
IV. CONTROL DEVICE INFORMATION			
A. Device ID No.:	E34	B. Device Type:	CRBAD2
V. CAM CASE-BY-CASE			
A. Indicator:	VOC breakthrough as indicated by a sample result greater than or equal to 100 ppm VOC	B. Minimum Frequency:	Once per week
		C. Averaging Period: N/A	
D. QA/QC Procedures:	On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.		
E. Verification Procedures:	VOC sampling and analysis shall be by photo-ionization detector (PID), Ultraray, or a TCEQ equivalent as approved by the Compliance Support Division.		
F. Representative Data:	Samples should be taken between the beds of the dual-bed system.		
VI. PERIODIC MONITORING CASE-BY-CASE			
A. Indicator:		B. Minimum Frequency:	
		C. Averaging Period:	
D. Periodic Monitoring Text:			

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:

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Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION			
A. Account No.:	GB-0004-L	B. RN No.:	RN102535077
C. CN No.:	CN600866800	D. Permit No.:	O1541
E. Project No.:	13408	F. Area Name:	Texas City Refinery
G. Company Name: BP Products North America, Inc.			
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION			
A. Revision No.:	28	B. Unit/EPN/Group/Process ID No.:	RHU-SEP1
		C. Applicable Form:	OP-UA14
III. APPLICABLE REGULATORY REQUIREMENT			
A. Name:	Chapter 115	B. SOP Index No.:	R5131-0010
C. Pollutant:	VOC	D. Main Standard:	115.132(a)(3)
E. Monitoring Type:	CAM	F. Unit Size:	LG
G. Deviation Limit: Any instance when the carbon is not changed out within 24-hours of receiving sampling results that indicate breakthrough has occurred (100 ppm VOC)			
IV. CONTROL DEVICE INFORMATION			
A. Device ID No.:	E48	B. Device Type:	CRBAD2
V. CAM CASE-BY-CASE			
A. Indicator:	VOC breakthrough as indicated by a sample result greater than or equal to 100 ppm VOC	B. Minimum Frequency:	Once per week
		C. Averaging Period:	N/A
D. QA/QC Procedures:	On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.		
E. Verification Procedures:	VOC sampling and analysis shall be by photo-ionization detector (PID), Ultraray, or a TCEQ equivalent as approved by the Compliance Support Division.		
F. Representative Data:	Samples should be taken between the beds of the dual-bed system.		
VI. PERIODIC MONITORING CASE-BY-CASE			
A. Indicator:		B. Minimum Frequency:	
		C. Averaging Period:	
D. Periodic Monitoring Text:			

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:

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Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION			
A. Account No.:	GB-0004-L	B. RN No.:	RN102535077
C. CN No.:	CN600866800	D. Permit No.:	O1541
E. Project No.:	13408	F. Area Name:	Texas City Refinery
G. Company Name: BP Products North America, Inc.			
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION			
A. Revision No.:	29	B. Unit/EPN/Group/Process ID No.:	RHU-SEP2
C. Applicable Form:		OP-UA14	
III. APPLICABLE REGULATORY REQUIREMENT			
A. Name:	Chapter 115	B. SOP Index No.:	R5131-0010
C. Pollutant:	VOC	D. Main Standard:	115.132(a)(3)
E. Monitoring Type:	CAM	F. Unit Size:	LG
G. Deviation Limit: Any instance when the carbon is not changed out within 24-hours of receiving sampling results that indicate breakthrough has occurred (100 ppm VOC)			
IV. CONTROL DEVICE INFORMATION			
A. Device ID No.:	E63	B. Device Type:	CRBAD2
V. CAM CASE-BY-CASE			
A. Indicator:	VOC breakthrough as indicated by a sample result greater than or equal to 100 ppm VOC	B. Minimum Frequency:	Once per week
C. Averaging Period:		N/A	
D. QA/QC Procedures:	On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.		
E. Verification Procedures:	VOC sampling and analysis shall be by photo-ionization detector (PID), Ultraray, or a TCEQ equivalent as approved by the Compliance Support Division.		
F. Representative Data:	Samples should be taken between the beds of the dual-bed system.		
VI. PERIODIC MONITORING CASE-BY-CASE			
A. Indicator:		B. Minimum Frequency:	
C. Averaging Period:			
D. Periodic Monitoring Text:			

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:

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Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION			
A. Account No.:	GB-0004-L	B. RN No.:	RN102535077
C. CN No.:	CN600866800	D. Permit No.:	O1541
E. Project No.:	13408	F. Area Name:	Texas City Refinery
G. Company Name: BP Products North America, Inc.			
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION			
A. Revision No.:	30	B. Unit/EPN/Group/Process ID No.:	ULCARU-SEP4
		C. Applicable Form:	OP-UA14
III. APPLICABLE REGULATORY REQUIREMENT			
A. Name:	Chapter 115	B. SOP Index No.:	R5131-0010
C. Pollutant:	VOC	D. Main Standard:	115.132(a)(3)
E. Monitoring Type:	CAM	F. Unit Size:	LG
G. Deviation Limit: Any instance when the carbon is not changed out within 24-hours of receiving sampling results that indicate breakthrough has occurred (100 ppm VOC)			
IV. CONTROL DEVICE INFORMATION			
A. Device ID No.:	W06	B. Device Type:	CRBAD2
V. CAM CASE-BY-CASE			
A. Indicator:	VOC breakthrough as indicated by a sample result greater than or equal to 100 ppm VOC	B. Minimum Frequency:	Once per week
		C. Averaging Period:	N/A
D. QA/QC Procedures:	On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.		
E. Verification Procedures:	VOC sampling and analysis shall be by photo-ionization detector (PID), Ultraray, or a TCEQ equivalent as approved by the Compliance Support Division.		
F. Representative Data:	Samples should be taken between the beds of the dual-bed system.		
VI. PERIODIC MONITORING CASE-BY-CASE			
A. Indicator:		B. Minimum Frequency:	
		C. Averaging Period:	
D. Periodic Monitoring Text:			

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:

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Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION			
A. Account No.:	GB-0004-L	B. RN No.:	RN102535077
C. CN No.:	CN600866800	D. Permit No.:	O1541
E. Project No.:	13408	F. Area Name:	Texas City Refinery
G. Company Name: BP Products North America, Inc.			
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION			
A. Revision No.:	31	B. Unit/EPN/Group/Process ID No.:	ULC-SEP7
		C. Applicable Form: OP-UA14	
III. APPLICABLE REGULATORY REQUIREMENT			
A. Name:	Chapter 115		B. SOP Index No.:
C. Pollutant:	VOC	D. Main Standard:	115.132(a)(3)
E. Monitoring Type:	CAM	F. Unit Size:	LG
G. Deviation Limit:	Any instance when the carbon is not changed out within 24-hours of receiving sampling results that indicate breakthrough has occurred (100 ppm VOC)		
IV. CONTROL DEVICE INFORMATION			
A. Device ID No.:	W07	B. Device Type:	CRBAD2
V. CAM CASE-BY-CASE			
A. Indicator:	VOC breakthrough as indicated by a sample result greater than or equal to 100 ppm VOC	B. Minimum Frequency:	Once per week
		C. Averaging Period:	N/A
D. QA/QC Procedures:	On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.		
E. Verification Procedures:	VOC sampling and analysis shall be by photo-ionization detector (PID), Ultraray, or a TCEQ equivalent as approved by the Compliance Support Division.		
F. Representative Data:	Samples should be taken between the beds of the dual-bed system.		
VI. PERIODIC MONITORING CASE-BY-CASE			
A. Indicator:	B. Minimum Frequency:		C. Averaging Period:
D. Periodic Monitoring Text:			

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:

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Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION		
A. Account No.: GB-0004-L	B. RN No.: RN102535077	C. CN No.: CN600866800
D. Permit No.: O1541	E. Project No.: 13408	F. Area Name: Texas City Refinery
G. Company Name: BP Products North America, Inc.		
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION		
A. Revision No.: 32	B. Unit/EPN/Group/Process ID No.: UU3-SEP12	C. Applicable Form: OP-UA14
III. APPLICABLE REGULATORY REQUIREMENT		
A. Name: Chapter 115	B. SOP Index No.: R5131-0010	
C. Pollutant: VOC	D. Main Standard: 115.132(a)(3)	
E. Monitoring Type: CAM	F. Unit Size: LG	
G. Deviation Limit: Any instance when the carbon is not changed out within 24-hours of receiving sampling results that indicate breakthrough has occurred (100 ppm VOC)		
IV. CONTROL DEVICE INFORMATION		
A. Device ID No.: W12	B. Device Type: CRBAD2	
V. CAM CASE-BY-CASE		
A. Indicator: VOC breakthrough as indicated by a sample result greater than or equal to 100 ppm VOC	B. Minimum Frequency: Once per week	C. Averaging Period: N/A
D. QA/QC Procedures:	On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.	
E. Verification Procedures:	VOC sampling and analysis shall be by photo-ionization detector (PID), Ultraray, or a TCEQ equivalent as approved by the Compliance Support Division.	
F. Representative Data:	Samples should be taken between the beds of the dual-bed system.	
VI. PERIODIC MONITORING CASE-BY-CASE		
A. Indicator:	B. Minimum Frequency:	C. Averaging Period:
D. Periodic Monitoring Text:		

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:

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Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION		
A. Account No.: GB-0004-L	B. RN No.: RN102535077	C. CN No.: CN600866800
D. Permit No.: O1541	E. Project No.: 13408	F. Area Name: Texas City Refinery
G. Company Name: BP Products North America, Inc.		
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION		
A. Revision No.: 33	B. Unit/EPN/Group/Process ID No.: UU3W OWS	C. Applicable Form: OP-UA14
III. APPLICABLE REGULATORY REQUIREMENT		
A. Name: Chapter 115	B. SOP Index No.: R5131-0010	
C. Pollutant: VOC	D. Main Standard: 115.132(a)(3)	
E. Monitoring Type: CAM	F. Unit Size: LG	
G. Deviation Limit: Any instance when the carbon is not changed out within 24-hours of receiving sampling results that indicate breakthrough has occurred (100 ppm VOC)		
IV. CONTROL DEVICE INFORMATION		
A. Device ID No.: W11	B. Device Type: CRBAD2	
V. CAM CASE-BY-CASE		
A. Indicator: VOC breakthrough as indicated by a sample result greater than or equal to 100 ppm VOC	B. Minimum Frequency: Once per week	C. Averaging Period: N/A
D. QA/QC Procedures:	On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.	
E. Verification Procedures:	VOC sampling and analysis shall be by photo-ionization detector (PID), Ultraray, or a TCEQ equivalent as approved by the Compliance Support Division.	
F. Representative Data:	Samples should be taken between the beds of the dual-bed system.	
VI. PERIODIC MONITORING CASE-BY-CASE		
A. Indicator:	B. Minimum Frequency:	C. Averaging Period:
D. Periodic Monitoring Text:		

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:

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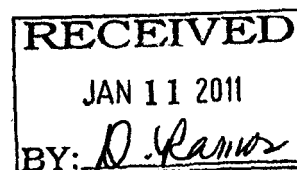
Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION		
A. Account No.: GB-0004-L	B. RN No.: RN102535077	C. CN No.: CN600866800
D. Permit No.: O1541	E. Project No.: 13408	F. Area Name: Texas City Refinery
G. Company Name: BP Products North America, Inc.		
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION		
A. Revision No.: 34	B. Unit/EPN/Group/Process ID No.: UU4-SEP1	C. Applicable Form: OP-UA14
III. APPLICABLE REGULATORY REQUIREMENT		
A. Name: Chapter 115	B. SOP Index No.: R5131-0010	
C. Pollutant: VOC	D. Main Standard: 115.132(a)(3)	
E. Monitoring Type: CAM	F. Unit Size: LG	
G. Deviation Limit: Any instance when the carbon is not changed out within 24-hours of receiving sampling results that indicate breakthrough has occurred (100 ppm VOC)		
IV. CONTROL DEVICE INFORMATION		
A. Device ID No.: W01	B. Device Type: CRBAD2	
V. CAM CASE-BY-CASE		
A. Indicator: VOC breakthrough as indicated by a sample result greater than or equal to 100 ppm VOC	B. Minimum Frequency: Once per week	C. Averaging Period: N/A
D. QA/QC Procedures:	On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.	
E. Verification Procedures:	VOC sampling and analysis shall be by photo-ionization detector (PID), Ultraray, or a TCEQ equivalent as approved by the Compliance Support Division.	
F. Representative Data:	Samples should be taken between the beds of the dual-bed system.	
VI. PERIODIC MONITORING CASE-BY-CASE		
A. Indicator:	B. Minimum Frequency:	C. Averaging Period:
D. Periodic Monitoring Text:		

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:

Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 3, 2011

MR MARK BERLINGER
ENVIRONMENTAL MANAGER
BP PRODUCTS NORTH AMERICA INC
PO BOX 401
TEXAS CITY TX 77592-0401

Re: Flexible Permit Alteration
Permit Numbers: 47256 and PSDTX402M2
Fccul Reliability Project
Texas City, Galveston County
Regulated Entity Number: RN102535077
Customer Reference Number: CN600866800
Account Number: GB-0004-L

Dear Mr. Berlinger:

This is in response to your letter received October 18, 2010, requesting alteration of the conditions and maximum allowable emission rates table (MAERT) of the above-referenced permit. We understand you wish to authorize an upcoming reliability project for the FCCU1. We also understand that you wish to lower the annual final emission caps to reflect the reduced emission contributions from the flares, associated with Permit By Rule Registration Number 92586.

As indicated in Title 30 Texas Administrative Code § 116.721(b) [30 TAC § 116.721(b)], and based on our review, Flexible Permit Number 47256 and PSDTX402M2 are altered. Enclosed are the altered permit conditions and MAERT to replace those currently attached to your permit. Please attach these to your permit.

Planned maintenance, startup, and shutdown emissions have been previously reviewed, authorized, and included in the MAERT. Any other maintenance activities are not authorized by this permit and will need to obtain a separate authorization.

As of July 1, 2008, all analytical data generated by a mobile or stationary laboratory in support of compliance with air permits must be obtained from a NELAC (National Environmental Laboratory Accreditation Conference) accredited laboratory under the Texas Laboratory Accreditation Program or meet one of several exemptions. Specific information concerning which laboratories must be accredited and which are exempt may be found in 30 TAC § 25.4 and § 25.6.

Mr. Mark Berlinger

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January 3, 2011

Re: Permit Numbers: 47256 and PSDTX402M2

For additional information regarding the laboratory accreditation program and a list of accredited laboratories and their fields of accreditation, please see the following Web site:

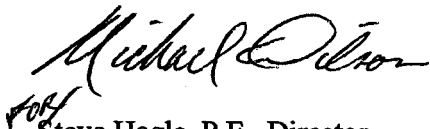
http://www.tceq.state.tx.us/compliance/compliance_support/qa/env_lab_accreditation.html

For questions regarding the accreditation program, you may contact the Texas Laboratory Accreditation Program at (512) 239-3754 or by e-mail at labprgms@tceq.state.tx.us.

Your cooperation in this matter is appreciated. If you need further information or have any questions, please contact Ms. Jill Parkes at (512) 239-1310 or write to the Texas Commission on Environmental Quality, Office of Permitting and Registration, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

This action is taken under authority delegated by the Executive Director of the Texas Commission on Environmental Quality.

Sincerely,



Steve Hagle, P.E., Director
Air Permits Division
Office of Permitting and Registration
Texas Commission on Environmental Quality

SH/JP/jp

Enclosure

cc: Director, Pollution Control Division, Galveston County Health District, La Marque
Air Section Manager, Region 12 - Houston
Air Permit Section Chief, U.S. Environmental Protection Agency, Region 6-Dallas

Project Number: 160843

SPECIAL CONDITIONS

Flexible Permit Numbers 47256 and PSDTX402M2

SPECIAL CONDITION NOS. 5 THROUGH 56 APPLY TO THE NORMAL OPERATIONS OF THE FACILITIES AUTHORIZED UNDER THIS PERMIT. SPECIAL CONDITION NOS. 57 THROUGH 68 APPLY TO THE PLANNED MAINTENANCE STARTUP AND SHUTDOWN ACTIVITIES AUTHORIZED BY THIS PERMIT.

EMISSION CAPS AND INDIVIDUAL LIMITATIONS

1. This permit authorizes emissions from those points listed in the attached table entitled "Emission Sources - Emission Caps and Individual Emission Limitations," (ECIELT) and the facilities covered by this permit are authorized to emit subject to the emission rate limits on the ECIELT and other requirements specified in the special conditions.

Planned startup and shutdown emissions due to the activities identified in Special Condition No. 57 are authorized from facilities and emission points identified in Attachment D in other construction permits at the site provided the facility and emissions are compliant with the respective ECIELT and special conditions, or Special Condition No. 66 of this permit. (8/10)

FEDERAL APPLICABILITY

2. These facilities shall comply with all applicable requirements of the U. S. Environmental Protection Agency (EPA) regulations on Standards of Performance for New Stationary Sources in Title 40 Code of Federal Regulations (40 CFR) Part 60, Subparts A, and:
 - A. Sulfuric Acid (H_2SO_4) Production Units, Subpart Cd;
 - B. H_2SO_4 Plants, Subpart H;
 - C. Petroleum Refineries, Subpart J (per Agreed Order Docket No. 2005-0224-AIR-E);
 - D. Storage Vessels for Petroleum Liquids, Subpart K;
 - E. Volatile Organic Liquid Storage Vessels, Subpart Kb; and
 - F. Equipment Leaks of Volatile Organic Compounds (VOC) in Petroleum Refineries, Subpart GGG. (8/10)

SPECIAL CONDITIONS

Flexible Permit Numbers 47256 and PSDTX402M2

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3. These facilities shall comply with all applicable requirements of EPA regulations on National Emission Standards for Hazardous Air Pollutants (NESHAPS) in 40 CFR Part 61, Subparts A, and:
 - A. Equipment Leaks of Benzene, Subpart J;
 - B. Equipment Leaks, Subpart V;
 - C. Benzene Transfer Operations, Subpart BB; and
 - D. Benzene Waste Operations, Subpart FF.
4. These facilities shall comply with all applicable requirements of EPA regulations on NESHAPS in 40 CFR Part 63, Subparts A, and:
 - A. Petroleum Refineries, Subparts CC;
 - B. Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recover Units, Subpart UUU; and
 - C. Marine Vessel Loading Operations, Subpart Y.

OPERATIONAL LIMITATIONS, WORK PRACTICES, AND PLANT DESIGN

5. Storage tanks are subject to the following requirements: The control requirements specified in paragraphs A-D of this condition shall not apply (1) where the VOC has an aggregate partial pressure of less than 0.50 psia at the maximum feed temperature or 95°F, whichever is greater, or (2) to storage tanks smaller than 25,000 gallons.
 - A. An internal floating deck or "roof" or equivalent control shall be installed in all tanks. The floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof: (1) a liquid-mounted seal, (2) two continuous seals mounted one above the other, or (3) a mechanical shoe seal. Installation of equivalent control requires prior review and approval by the Texas Commission on Environmental Quality (TCEQ) Executive Director.

SPECIAL CONDITIONS

Flexible Permit Numbers 47256 and PSDTX402M2

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- B. An open-top tank containing a floating roof (external floating roof tank) which uses double seal or secondary seal technology shall be an approved control alternative to an internal floating roof tank provided the primary seal consists of either a mechanical shoe seal or a liquid-mounted seal and the secondary seal is rim-mounted. A weathershield is not approvable as a secondary seal unless specifically reviewed and determined to be vapor-tight.
- C. For any tank equipped with a floating roof, the permit holder shall perform the visual inspections and seal gap measurements as specified in 40 CFR § 60.113b, Testing and Procedures (as amended at 54 FR 32973, Aug. 11, 1989), to verify fitting and seal integrity. Records shall be maintained of the dates seals were inspected and seal gap measurements made, results of inspections and measurements made (including raw data), and actions taken to correct any deficiencies noted.
- D. The floating roof design shall incorporate sufficient flotation to conform to the requirements of American Petroleum Institute (API) Code 650, or an equivalent degree of flotation, except that an internal floating cover need not be designed to meet rainfall support requirements and the materials of construction may be steel or other materials.

The floating roof design for all new or retrofitted roofs shall incorporate sufficient flotation to conform to the requirements of API Code 650 dated November 1, 1998 or later except that an internal floating cover need not be designed to meet rainfall support requirements and the materials of construction may be steel or other materials.

- E. Uninsulated tank exterior surfaces exposed to the sun shall be white or aluminum except where a dark color is necessary to help the tank absorb or retain heat in order to maintain the material in the tank in a liquid state. The following existing tanks are exempt from the white or aluminum requirement: Fixed-Roof Tanks 41, 42, 59, 60, 60A, 73, 73A, 1012, and 1013. Storage tanks must be equipped with permanent submerged fill pipes.
- F. The permit holder shall maintain records which includes tank identification number, control method used, tank capacity in gallons, name of the material stored, VOC molecular weight, VOC monthly average temperature in degrees Fahrenheit, VOC vapor pressure at the monthly average material temperature in psia, VOC throughput for the previous month and year-to-date. Records of VOC monthly average temperature are not required to be kept for unheated tanks which receive liquids that are at or below ambient temperatures. (8/10)

SPECIAL CONDITIONS

Flexible Permit Numbers 47256 and PSDTX402M2

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6. Pressure tanks shall be maintained such that there are no emissions of VOC to the atmosphere during normal operating conditions (including filling operations). If emissions occur during normal operations, they shall be routed to a flare which achieves at least 98 percent destruction efficiency.
7. Marine vessel loading operations at this facility are limited to the handling of gasolines, gasoline blending components, gasoline boiling range products, distillates, and black oils. Loading of other chemicals is prohibited unless allowed under permit by rule, amendment to this flexible permit, or other TCEQ authorization, or prior approval is obtained from the Executive Director of the TCEQ.
8. Loading emissions from marine loading operations shall be routed to thermal oxidizers which shall operate at a minimum VOC destruction efficiency of 99 percent by weight. During loading operations, the minimum operating temperature of the thermal oxidizers shall be 1250°F. Records of thermal oxidizer operating temperatures shall be kept for each loading operation.
9. Loading rates at the marine docks shall be reduced as needed in the event that two of the thermal oxidizers are inoperable. Loading of hydrocarbons with a true vapor pressure of greater than or equal to 0.5 psia at maximum temperature shall cease in the event that all three thermal oxidizers are inoperable. Records shall be kept for each loading operation and shall include the name and quantity of material loaded.

Operation without visible liquid leaks or spills shall be maintained at all loading/unloading facilities, regardless of vapor pressure. This does not apply to momentary dripping associated with the initial connection or disconnection of fittings. Sustained dripping from fittings during loading/unloading operations is not permitted. Any liquid spill that occurs during loading/unloading activities shall be reported pursuant to Title 30 Texas Administrative Code (30 TAC) §§ 101.201, 101.211, and 101.221 and shall be cleaned up immediately to minimize air emissions. (2/10)

10. Gases to be combusted in the marine dock thermal oxidizers shall at all times be combustible upon mixing with a stoichiometric quantity of air. When necessary to insure adequate combustion, sufficient fuel gas shall be added to make the gases combustible.
11. The holder of this permit shall maintain marine vessel loading equipment in such a manner that vapor-tight connections can be made. A blower system shall be installed which will produce a vacuum during loading operations. Should the blower system cease operating for any reason, loading operations shall cease immediately. The vacuum system shall be repaired before loading operations can resume. A pressure/vacuum gauge shall be installed

SPECIAL CONDITIONS

Flexible Permit Numbers 47256 and PSDTX402M2

Page 5

such that a negative pressure can be verified in the vessel and/or compartment being loaded. Normal operation will be negative three inches of water. Records of all blower system repairs and associated downtime shall be maintained.

12. The marine dock thermal oxidizers shall be equipped with an automatic ignition system that assures gas ignition before loading and provides immediate notification of appropriate personnel when the ignition system ceases to function.
13. Uncontrolled loading of marine vessels without the use of vapor control is allowable under this permit for those materials that have a true vapor pressure of no greater than or equal to 0.50 psia at the actual loading temperature, provided that all applicable federal and state rules and regulations are met.
14. All flares shall be designed and operated in accordance with the following requirements:
 - A. The combined refinery fuel natural gas and waste stream to the flare shall meet the 40 CFR § 60.18 specifications of minimum heating value and maximum tip velocity under normal, upset, and maintenance flow conditions. Compliance with this condition shall be demonstrated by monitoring required in Paragraph D of this condition. Flare testing per 40 CFR § 60.18(f) may be requested by the TCEQ Houston Regional Office, in addition to New Source Performance Standards (NSPS) or federal requirements, to demonstrate compliance with this condition. Testing to confirm the heating value (Btu per standard cubic feet [scf]) may be requested by the TCEQ Houston Regional Office to demonstrate compliance with this condition.
 - B. The flare(s) shall be operated with a pilot flame present at all times and have a constant pilot flame or an automatic re-ignition system. The pilot flame shall be monitored by a thermocouple or an infrared monitor.
 - C. The flares shall be operated with no visible emissions except periods not to exceed a total of five minutes during any two consecutive hours. This shall be ensured by the use of steam assist to the flare (for steam-assisted flares). The permit holder shall ensure proper flare operation through monitoring by Paragraph D of this condition.
 - D. The holder of this permit shall install a continuous flow monitor that provides a record of the vent stream flow to the flare. The flow monitor sensor should be installed in the vent stream such that the total vent stream to the flare is measured. The average hourly values of the flow shall be recorded and maintained electronically. The holder of this permit shall provide the daily average flow rate

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(24-hour average) to each flare. These monitors shall be operational no later than July 13, 2010.

The holder of this permit shall conduct an analysis (grab sample) of the flare composition (total VOC, benzene, hydrogen sulfide (H₂S), and Btu content) on or before May 31, 2007. The analysis shall be conducted on a semiannual basis (once during the summer months and once during the winter months). The holder of this permit may submit a request to the TCEQ Houston Regional Office to reduce the sampling frequency. The sampling shall be conducted such that the total vent stream to the flare is included in the analysis. Records of the grab sampling results, including flare identification number, sampling date, sampling location, flare composition, and calculated net heating value in Btu/scf for each flare, shall be maintained. (PSD) (9/06)

15. Safety relief valves that discharge to the atmosphere only as a result of fire shall be equipped with a rupture disc and pressure gauge. The pressure gauge shall be installed between the relief valve and the rupture disc to monitor disc integrity.

Atmospheric relief valves which are not equipped with a rupture disc shall be monitored for leaks on a quarterly basis with an approved gas analyzer beginning no later than July 13, 2007. A leak shall be defined as 500 parts per million by volume (ppmv). There shall be no variance for inaccessible valves which are not equipped with a rupture disc and pressure gauge or pressure transmitting device.

All leaking discs shall be replaced at the earliest opportunity, but no later than the next unit shutdown. Discs to be replaced shall be identified on an equipment list, and this list shall be made available to TCEQ or local air pollution control program representative.

Records of quarterly atmospheric relief valve monitoring results, including the relief valve identification, monitoring date, monitoring result, disk replacement or installation date, and next unit shutdown date after leak discovery shall be maintained. (8/10)

Sulfur Recovery/Amine Treating Units

16. The minimum sulfur recovery efficiency for these permitted units shall be 99.8 percent. The sulfur recovery efficiency shall be determined by calculation as follows:

$$\text{Efficiency} = \frac{(\text{S recovered}) * (100)}{(\text{S acid gas})}$$

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Where:

Efficiency	=	sulfur recovery efficiency, percent
S recovered	=	(S acid gas - S stack, or S produced), long tons per day (LTPD)
S acid gas	=	(S recovered plus S stack), LTPD
S stack	=	sulfur in incinerator stack, LTPD

The average sulfur emission reduction efficiency (sulfur recovery efficiency) shall be demonstrated for each 24-hour period by a mass balance calculation using data obtained from the incinerator stack sulfur dioxide (SO₂) monitor, sulfur production records, stack mass flow rate, and other process flow data. Records of the calculated recovery efficiency, sulfur in the incinerator stack, sulfur produced, sulfur in the acid gas, the compliance calculations, and a detailed example of the compliance calculations shown above shall be maintained on-site. The sulfur recovery efficiency of this condition is not applicable during start-up, shutdown, or upset conditions if proper procedures of 30 TAC Chapter 101 are followed. (PSD)

17. The total sulfur recovered from the combined SRU Trains (Trains 1 through 4) shall not exceed 1300 LTPD of sulfur (based on a 24-hour period). At no time during normal operation shall the excess capacity be less than 75 percent redundancy. (PSD)
18. The SRU thermal reactors that receive ammonia acid gas from the sour water stripper overheads shall at all times be operated with a stable flame, and the SRUs shall operate with a flame temperature within recommended design specifications, but shall operate at no less than 2000°F. The flame temperature of each SRU thermal reactor shall be continuously monitored and recorded.
19. All acid gas streams from the amine regeneration units, and sour water stripper overheads, containing H₂S shall be routed to the SRUs or other process units under normal operating conditions. It is not permissible under any conditions to vent acid gases directly to the atmosphere. (PSD)
20. Emissions from the sulfur pits, sulfur storage, and sulfur loading operations shall be collected by a vapor collection system and routed either back to the SRU thermal reactor or to the SRU Tail Gas Incinerator (TGI). (PSD)
21. The minimum firebox chamber temperatures in the SRU TGIs shall not go below 1200°F during normal operating conditions. If stack testing in the TGI exhaust indicates that a higher temperature is necessary to obtain a minimum H₂S and VOC destruction efficiency of 99.9 percent, then the temperature obtained during the stack test will become the new

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minimum incinerator firebox chamber temperature. The firebox temperature of each TGI shall be continuously monitored and recorded.

22. The SRU TGIs shall operate with no visible emissions except for uncombined steam.

23. Contingency Plan for the SRU

Should there be loss of sulfur recovery potential from the Claus trains, TGTU, or TGIs, any combination of the following steps shall be taken as soon as possible, but no later than two hours from the start of the event:

- A. Reroute the maximum amount of acid gas to the operating SRUs or equipment (such as the remaining sulfur recovery trains, TGTU, and TGI). This action can include increasing the oxygen (O₂) injection rate to add SRU capacity.
- B. Reroute any remaining acid gas to the TGIs. If the TGIs are not operable, the acid gas should be routed to the emergency flares.
- C. Shut down the sour water strippers and accumulate sour water in tankage for future processing.
- D. Reduce production, reduce charge rates at upstream units, and switch to lower-sulfur purchased gas oils and crude oils as necessary to reduce the amine loading and cease acid gas flaring within eight hours of the event. This action may include shutting down one and/or all units which supply acid gas to the SRU complex.
- E. Any other action not listed that will allow the SRU to recover from the loss of sulfur recovery potential. All actions conducted under this paragraph shall be documented. The documentation shall include the specific action taken, time the action was taken, affect on upstream/downstream facilities (heaters, other control devices, etc), and overall affect on emissions from the SRU or other facilities. This documentation shall be included in any reports submitted to the TCEQ Houston Regional Office or local air pollution control program representative. This information shall also be maintained on site and made available to TCEQ or local air pollution control program representatives upon request.

The permit holder shall meet the recordkeeping and reporting requirements of 30 TAC §§ 101.201 and 101.211 in addition to this permit condition.

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24. Records shall be maintained for all SRU, Tail Gas Treating Unit (TGTU), and TGI downtime. These records shall include the date and duration of downtime, amount of bypassed acid gas flared, the cause of the downtime, and corrective action taken. The permit holder shall meet the recordkeeping and reporting requirements of 30 TAC §§ 101.201 and 101.211 in addition to this permit condition.

25. Sour Water Stripper Retention

The sour water stripper system feeding the SRUs shall have a minimum on-line retention and separation (hold up) time of three days based on normal operational levels and maximum expected feed rates.

26. The retention time of the rich amine and lean amine drums shall meet at least 30 minutes of retention at maximum production levels.

FCCUs

27. The final emission caps are based on FCCUs 1 and 3 (Emission Point Nos. [EPNs] 93 and 34) meeting the following concentrations, averaged over a one-hour period.

carbon monoxide (CO)	500 ppmv
SO ₂	200 ppmv
nitrogen oxide (NO _x)	200 ppmv
VOC	10 ppmv

The initial emission caps are based on the following: 500 ppmv CO, and 300 ppmv SO₂ from FCCU 1, and 500 ppmv CO from FCCU 3. (PSD) (10/10)

28. The final emission caps are based on the FCCU stacks meeting 1.0 pound of particulate matter (PM) per 1,000 pounds of coke burn-off (with PM emissions measured per the EPA Methods 5B and 8). (PSD)
29. For the final ammonia emission cap, the FCCU electrostatic precipitators shall not exceed 10 ppmv ammonia slip. The ammonia injection rate to the FCCUs shall be continuously monitored and recorded.
30. The opacity of emissions from the FCCUs shall not exceed 20 percent averaged over a six-minute period, as determined by an opacity monitoring device or trained observer, except as provided for in 30 TAC § 111.111(a)(1)(E).

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31. The seven-day rolling average of NO_x concentration limits below shall not apply during periods of start-up, shutdown, or malfunction. (10/10)

A. FCCU 1 Concentration Limits

Beginning October 7, 2005, FCCU 1 shall comply with a NO_x limit of 40 ppmvd at zero percent O₂ on a 365-day rolling average and 80 ppmvd at zero percent O₂ on a seven-day rolling average basis, except as provided below.

The seven-day rolling average NO_x limit does not apply during periods of hydrotreater outages if, pursuant to the Consent Decree amendment issued October 7, 2005, the permit holder has submitted and EPA has approved an alternate operating plan that minimizes emissions as much as practicable through the use of (but not limited to) low sulfur feed, storage of hydrotreated feed and increase in additive rates.

B. FCCU 3 Concentration Limits

If the permit holder has installed a selective catalytic reduction (SCR) unit on FCCU 3, then beginning July 1, 2007, FCCU 3 shall comply with a NO_x limit of 20 ppmvd at zero percent O₂ on a 365-day rolling average and 40 ppmvd at zero percent O₂ on a 7-day rolling average basis.

If the permit holder has not installed an SCR on FCCU 3, then beginning July 1, 2007, FCCU 3 shall comply with a NO_x limit of 30 ppmvd at zero percent O₂ on a 365-day rolling average and 60 ppmvd at zero percent O₂ on a 7-day rolling average basis.

The seven-day rolling average may increase temporarily to 120 ppmvd if, pursuant to the Consent Decree amendment issued October 7, 2005, the permit holder submits and EPA approves a report detailing reasons for the outage(s) of the SCR or NO_x control device within 30 days after the outage occurs. The outages can only be due to reasons other than startup, shutdown or malfunction.

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32. The seven-day rolling average of SO₂ concentration limits below shall not apply during periods of start-up, shutdown, or malfunction. (10/10)

A. FCCU 1 Concentration Limits

Beginning October 7, 2005, FCCU 1 shall comply with a SO₂ limit of 50 ppmvd at zero percent O₂ on a 365-day rolling average and 150 ppmvd at zero percent O₂ on a seven-day rolling average basis, except as provided below.

The seven-day rolling average SO₂ limit does not apply during periods of hydrotreater outages if, pursuant to the Consent Decree amendment issued October 7, 2005, the permit holder has submitted and EPA has approved an alternate operating plan that minimizes emissions as much as practicable through the use of (but not limited to) low sulfur feed, storage of hydrotreated feed and increase in additive rates.

B. FCCU 3 Concentration Limits

Beginning July 1, 2007, FCCU 3 (EPN34) shall comply with a SO₂ limit of 25 ppmvd at zero percent O₂ on a 365-day rolling average and 50 ppmvd at zero percent O₂ on a 7-day rolling average basis.

FIRED UNITS (HEATERS and BOILERS)

33. The final emission caps are based on fuel gas (used to fire all heaters, boilers, oxidizers, incinerators, flares, and other combustion devices) having an H₂S concentration of 162 ppmv or 0.1 grain per dry standard cubic foot on a one-hour average basis. The H₂S concentration in the fuel gas system shall be continuously monitored and recorded. (PSD) (10/10)
34. The opacity from all heaters, boilers, etc., shall not exceed 5 percent averaged over a six-minute period, except for those periods described in 30 TAC § 111.111(a)(1)(E).
35. The final emissions cap is based on a combined average NO_x emission value of 0.035 lb NO_x/MMBtu from all boilers and heaters.
36. The UC-103B is limited to firing no more than 99 MMBtu/hr. Records verifying the firing rate for this unit shall be maintained on-site.

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WASTEWATER

37. Emissions from wastewater process equipment shall be controlled as follows:

- A. Emissions from the dissolved air flotation, gravity thickener, and API No. 2 shall be routed to a thermal oxidizer capable of obtaining a VOC destruction efficiency of 99.9 percent.
- B. Emissions from APIs 1 and 3 shall be routed to a carbon adsorption system. The carbon adsorption system shall be installed and operating no later than July 13, 2010. The carbon adsorption system shall meet the requirements of Special Condition No. 47 of this permit.
- C. Wastewater process equipment upstream of the biological treatment units (activated sludge) shall either be covered and/or routed to a control device (either a thermal oxidizer, flare, or carbon canister system). (10/10)

INITIAL AND PERIODIC SAMPLING REQUIREMENTS

38. Sampling port(s) and platforms(s) shall be incorporated into the design of the combustion source stack(s) per specifications in the attachment entitled "Chapter 2, Stack Sampling Facilities" of the TCEQ Sampling Procedures Manual. Platform(s) will not be necessary for existing stacks of combustion facilities that will not be equipped with continuous emissions monitoring system (CEMS) and do not currently have platform(s) included in their design. Alternate sampling facility designs may be submitted for approval by the Executive Director of the TCEQ.
39. The holder of this permit shall perform stack sampling and other testing, as required, to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the following sources:

FCCU 1 and 3 Stacks (EPNs 93 and 34)
SRU TGI exhausts before the Common Stack (EPN 384)
Marine Dock Thermal Oxidizers (EPNs 294-1, 294-2, and 294-3)
All boilers and heaters with firing rates of 40 MMBtu/hr or greater
In addition, common stacks (if any) containing units capable of 40 MMBtu/hr or greater shall also be sampled.

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The permit holder is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense. Sampling shall be conducted in accordance with the appropriate procedures of the TCEQ Sampling Procedures Manual and the EPA Reference Methods.

Requests to waive testing for any pollutant specified in this condition shall be submitted to the TCEQ Air Permits Division. Test waivers and alternate/equivalent procedure proposals for 40 CFR Part 60 testing which must have EPA approval shall be submitted to the TCEQ Regional Director. (10/10)

- A. The TCEQ Houston Regional Office shall be contacted as soon as testing is scheduled, but not less than 45 days prior to sampling to schedule a pretest meeting.

The notice shall include:

- (1) Date for pretest meeting.
- (2) Date sampling will occur.
- (3) Name of firm conducting sampling.
- (4) Type of sampling equipment to be used.
- (5) Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for the test reports. The TCEQ Houston Regional Director must approve any deviation from specified sampling procedures.

- B. Air contaminants emitted from the listed sources to be tested for include (but are not limited to) the following:

FCCU	NO _x , CO, SO ₂ , VOC, TSP*, PM ₁₀ *, ammonia, H ₂ SO ₄ , and O ₂
SRU TGI(s)	SO ₂ , H ₂ S, H ₂ SO ₄ , NO _x , CO, VOC, and O ₂
Boilers, Heaters, Furnaces, etc	SO ₂ , H ₂ SO ₄ , NO _x , CO, VOC, and O ₂
Marine Dock Thermal Oxidizers	NO _x , CO, VOC, and O ₂
Units equipped with ammonia injection	ammonia

* TSP - total suspended particulate

* PM₁₀ - particulate matter equal to or less than 10 microns in diameter

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- C. Sampling shall occur within 60 days after achieving the maximum production rate at which the facility will be operated, but no later than 180 days after start-up following modification of a emission source (facility), or within 60 days after achieving normal operation (for those units being restarted due to Hurricane Rita), and other such times as determined necessary to verify compliance with the emissions cap as required by the TCEQ Houston Regional Director or the TCEQ Executive Director. Requests for additional time to perform sampling shall be submitted to the TCEQ Houston Regional Office.

The permit holder may submit a request to perform representative sampling for combustion units that are similar in function, heat input, etc. The request shall be submitted to, and approved by, the TCEQ Houston Regional Office before sampling begins.

- D. The EPN being tested shall operate at maximum production or firing rates during stack emission testing. Primary operating parameters that enable determination of production rate shall be monitored and recorded during the stack test. These parameters are to be determined at the pretest meeting. If the EPN is unable to operate at maximum rates during testing, then additional stack testing may be required when higher firing rates are achieved. (Additional testing will not be required if the EPN is equipped with a CEMS.)

- E. Copies of the final sampling report shall be forwarded to the TCEQ within 60 days after sampling is completed. Sampling reports shall comply with the attached provisions of Chapter 14 of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:

One copy to the TCEQ Houston Regional Office.

- F. Stack sampling for those units which are not equipped with a CEMS shall be repeated every five years after the initial sampling in conformity with A, B, and D of this condition. Facilities which are not being modified and have been tested in the last five years shall be tested within five years of the last test date (even if those sources have not been tested for VOC during previous tests).
- G. For fired units equipped with ammonia injection, the initial compliance stack test shall test for the presence of ammonia slip in the stack. After the initial stack test, grab samples for ammonia shall be conducted weekly during the first 60 days of operation. After operating procedures have been developed to prevent excess amounts of ammonia from being injected, the frequency of ammonia grab sampling can be reduced to a quarterly basis. If the grab samples exceed 10 ppmv at any time,

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the holder of this permit shall return to weekly ammonia sampling until such time as repairs are conducted, or the sampling indicates that the ammonia slip is 5 ppmv or less.

- H. The three FCCUs shall be stack sampled for the presence of H_2SO_4 within 60 days after achieving normal operation (after the restart due to Hurricane Rita). The holder of this permit shall submit a permit amendment application within 60 days of completing the stack sampling of the FCCUs to incorporate the H_2SO_4 into an emissions cap, or list the H_2SO_4 emissions as an individual emission limitation. If necessary, the holder of this permit shall include netting calculations, and/or Prevention of Significant Deterioration forms, tables, etc. in the amendment package. The amendment package shall include all calculations, assumptions, best available control technology (BACT) determinations, and a proposal for determining compliance with the short-term and annual emission rate or caps. (PSD) (8/10)
40. The holder of this permit shall submit a sampling and testing plan to the TCEQ Houston Regional Office (with a copy routed to the TCEQ Air Permits Division) for review and approval no later than September 13, 2005.

The sampling plan shall specify the sampling methods and other testing, as necessary, to establish the emissions (lb/hr and TPY) of VOC being emitted to the atmosphere from the wastewater system associated with this permit. Sampling and testing shall begin within 60 days of plan approval.

Within 30 days after completion of the sampling, copies of the sampling report shall be submitted to the following:

One copy to the TCEQ Air Permits Division, Austin.
One copy to the TCEQ Houston Regional Office.

Sampling of the wastewater system, as specified in this section, is waived if the permit holder determines that sufficient information is currently available to adequately model the wastewater treating system through the use of Water 8 or Water 9 wastewater model. The applicant shall submit revised emission calculations using one of these models, to the Air Permits Division for review and approval, no later than September 13, 2005 and one of the following permit applications.

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- A. If the wastewater models show a decrease in the emission contribution from the wastewater treating facilities compared to the emissions obtained from using AP-42 emission factors, the holder of this permit shall submit a permit alteration to adjust emissions cap to reflect the emissions obtained from the use of the water models.
- B. If the wastewater models show an increase in emissions compared to the emissions obtained from using AP-42 emission factors, the holder of this permit shall submit a permit amendment to increase the final emissions cap. (8/10)

ON-GOING MONITORING REQUIREMENTS

- 41. The holder of this permit shall install, calibrate, and maintain a CEMS to measure and record the in-stack concentrations of the following compounds from all of the following facilities by December 31, 2005: (10/10)
 - A. FCCU Stacks (EPNs 93 and 34): SO₂, NO_x, CO, Opacity, and O₂
 - B. SRU TGI Stacks (EPNs 384): SO₂ and O₂.
 - C. A CEMS to measure and record the in-stack concentrations of NO_x, CO, and O₂ shall be operational and used to monitor emissions from any boiler, heater, or combustion device with a maximum firing rate greater than or equal to 100 MMBtu/hr.
- 42. Each CEMS required by these conditions shall comply with the following:
 - A. The CEMS shall meet the design and performance specifications, pass the field tests, and meet the installation requirements and the data analysis and reporting requirements specified in the applicable Performance Specification Nos. 1 through 9, 40 CFR Part 60, Appendix B. If there are no applicable performance specifications in 40 CFR Part 60, Appendix B, contact the TCEQ Air Permits Division for requirements to be met.
 - B. Paragraph B(1) of this condition applies to sources subject to the quality-assurance requirements of 40 CFR Part 60, Appendix F; Paragraph B(2) of this condition applies to all other sources:

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- (1) The permit holder shall assure that the CEMS meets the applicable quality-assurance requirements specified in 40 CFR Part 60, Appendix F, Procedure 1. Relative accuracy exceedances, as specified in 40 CFR Part 60, Appendix F, § 5.2.3 and any CEMS downtime shall be reported to the TCEQ Houston Regional Director, and necessary corrective action shall be taken. Supplemental stack concentration measurements may be required at the discretion of the TCEQ Houston Regional Director.
- (2) The system shall be zeroed and spanned daily, and corrective action taken when the 24-hour span drift exceeds two times the amounts specified in the applicable Performance Specification Nos. 1 through 9, 40 CFR Part 60, Appendix B, or as specified by the TCEQ if not specified in Appendix B. Zero and span is not required on weekends and plant holidays if instrument technicians are not normally scheduled on those days.

Each monitor shall be quality-assured at least quarterly using Cylinder Gas Audits (CGA) in accordance with 40 CFR Part 60, Appendix F, Procedure 1, Section 5.1.2, with the following exception: a relative accuracy test audit (RATA) is not required once every four quarters (i.e., four successive quarterly CGA may be conducted). An equivalent quality-assurance method approved by the TCEQ may also be used. Successive quarterly audits shall occur no closer than two months.

All CGA exceedances of ± 15 percent accuracy indicate that the CEMS is out of control.

- C. The monitoring data shall be reduced to hourly averages concentrations at least once everyday, using a minimum of four equally-spaced data points from each one-hour period. The individual average concentrations shall be reduced to units of lb/hr at least once every week as follows:

The measured hourly average concentration from the CEMS shall be multiplied by the exhaust gas flow rate of the source (measured by true exhaust flow meters, or measured during the latest stack test performed in accordance with Special Condition No. 39, or calculated using fuel flow meters required by §117.340) to determine the hourly emission rate.

- D. All monitoring data and quality-assurance data shall be maintained by the source. The data from the CEMS may, at the discretion of the TCEQ, be used to determine compliance with the conditions of this permit.

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- E. The TCEQ Houston Regional Office shall be notified at least 30 days prior to any required RATA in order to provide them the opportunity to observe the testing.
 - F. Quality-assured (or valid) data must be generated when the facility generating emissions is operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in minutes) that the facility generating emissions operated over the previous rolling 12-month period. The measurements missed shall be estimated using engineering judgement and the methods used recorded. Options to increase system reliability to an acceptable value, including a redundant CEMS, may be required by the TCEQ Houston Regional Director. (PSD) (8/10)
43. Boilers, heaters, etc., with maximum firing rates of greater than or equal to 40 MMBtu/hr and less than 100 MMBtu shall be sampled in accordance with this condition. The terms of this condition are effective upon implementation of BACT for a particular device or for combustion devices for which additional controls are not anticipated no later than July 13, 2006.

After completion of the initial stack test, the holder of this permit shall conduct annual stack tests for NO_x and CO. The stack test shall be comprised of no less than the average of three one-hour readings for each pollutant.

The results of the stack test shall be recorded in terms of ppm and converted into values of lb/hr and TPY within 30 days of sampling (unless a mass emission rate can be estimated at the time of the test). The annual stack tests shall start after the initial stack test for each unit and shall occur during the same quarter annually. Stack tests for those boilers and heaters that will not be modified, and are not required to complete the initial stack test in the first year from the issuance of the flexible permit (because they were tested within the last five years), will be completed no later than July 13, 2006. The SO₂ emissions from the unit being tested shall also be estimated on an annual basis using the H₂S concentrations obtained from the H₂S fuel gas monitoring system and the fuel flow rate to the unit being tested.

In addition to the above testing requirements, the fuel flow rate (along with other parameters determined at the pretest meeting to be essential for monitoring a units performance) shall be continuously monitored and recorded. Beginning no later than September 13, 2005, the heating value of the fuel (Btu/scf) shall be determined on a quarterly basis through grab sampling.

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Should the stack test from a particular unit indicate an exceedance of the short-term (lb/hr) and/or annual (TPY) emission rate used in the emission cap calculation, the applicant shall provide adequate information to demonstrate continuing compliance with the emissions cap.

Records shall be maintained indicating any exceedance of units represented firing rates. Should the firing rate of any unit exceed its permit representations (represented contribution to the emission cap), the holder of this permit shall provide adequate information to demonstrate continuing compliance with the emissions cap. (8/10)

44. For boilers, heaters, etc., with maximum firing rates less than 40 MMBtu/hr, the fuel flow rate shall be continuously monitored and recorded. The heating value of the fuel (Btu/scf) shall be determined on a quarterly basis through grab sampling. In addition, H₂S concentrations shall be obtained from the H₂S fuel gas monitoring system. Records, including the flow, quarterly Btu, and H₂S, shall be maintained and used to indicate any exceedance of a unit's represented firing rate(s). Should the firing rate of any unit exceed its permit representations, the holder of this permit shall provide adequate information to demonstrate continuing compliance with the emissions cap.
45. For SRUs that handle ammonia acid gas from sour water stripper overheads, the holder of this permit may do either of the following:
 - A. The acid gas exiting the waste heat boilers shall be sampled for ammonia on a monthly basis. When the ammonia concentration exceeds 300 ppmv, the holder of this permit shall implement procedures or actions that are needed to ensure that the sampled ammonia concentration drops below 300 ppmv by the time the next monthly sample is taken. After six months of demonstrating compliance with the 300 ppmv limit, the holder of this permit may request, via alteration, that the sampling frequency be performed on a quarterly basis. Drager tubes or another sampling method, as approved by the TCEQ, shall be used to sample for ammonia. A copy of the sampling data will be required in order to revise the sampling frequency.
 - B. The holder of this permit shall inspect the sulfur condenser outlets (each sulfur condenser) on each SRU for the presence of ammonia salt formation or buildup. The inspections shall be conducted on an annual basis, and the TCEQ Houston Regional Office shall be informed prior to conducting the inspection (and given the opportunity to observe the sulfur condenser inspection). If ammonia salts are present, the holder of this permit shall implement a monthly ammonia sampling frequency as described in Paragraph A of this condition and the TCEQ Houston Regional Office shall be notified within 30 days.

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The sampling results shall be presented in terms of ppmv. The ammonia sampling of the acid gas exiting the SRUs, or inspections of the sulfur condensers for each SRU shall commence no later than May 13, 2006. Records of sampling/inspection time, date, and sampling/inspection results shall be maintained. (8/10)

46. The holder of this permit shall perform sampling and other testing as necessary to establish and demonstrate ongoing compliance with the VOC emission limits, pounds per hour (lb/hr) and tons per year (TPY), from the cooling towers. The cooling tower return water shall be monitored monthly with an approved air stripping system, or approved equivalent, when the cooling towers are in service. The minimum detection level of the testing system shall be equivalent to no more than approximately 5 ppmv. The appropriate equipment shall be maintained so as to minimize fugitive VOC emissions from the cooling tower. The results of the monitoring and maintenance efforts shall be recorded.

If a leak equivalent to more than the ppmv value listed above is detected, the owner or operator shall repair the leak as soon as practical but not later than 45 calendar days after the holder of this permit receives results of monitoring indicating a leak. Documentation of a decision to delay repair shall state the reasons repair was delayed and shall specify a schedule for completing the repair as soon as possible. For the purposes of this permit condition, delay of repair means exceeding the 45-day time frame described above. Prior to exceeding the time frame described above, all documentation of a decision to delay repair shall be submitted to the TCEQ Houston Regional Office for review and approval.

Delay of repair on heat exchanger systems for which leaks have been detected is allowed if the equipment is isolated from the process. In addition, delay of repair is also allowed in the following situations:

- A. If repair is technically infeasible without a shutdown, and a shutdown is expected within the next two months.
- B. Delay of repair is also allowed for up to 120 calendar days if necessary parts or personnel were not available.
- C. Delay of repair is also allowed if repair is technically infeasible without a shutdown and the shutdown would cause greater emissions than the potential emissions from delaying repair. The owner or operator may delay repair until the next shutdown of the process equipment associated with the leaking heat exchanger. The owner or operator shall document the basis for the determination that a shutdown for repair would cause greater emissions than the emissions likely to result from delaying repair.

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47. Carbon Canister Sampling. The carbon adsorption system controlling emissions from APIs 1 and 3 shall consist of a dual carbon system. (10/10)
- A. The carbon canisters shall be sampled and recorded, three times per week, to determine breakthrough of VOC for the dual carbon systems controlling the APIs and Lift Stations. The carbon canisters shall be sampled and recorded one time per week, to determine breakthrough of VOC for the dual carbon systems controlling Oil Water Separators (OWS) or Dry Weather Sumps (DWS) on the units in or outside battery limit (OSBL) areas. The sampling point shall be at the outlet of the first carbon bed but before the inlet to the second carbon bed.
 - B. Breakthrough shall be defined as a VOC concentration of 100 ppmv as measured as methane. When VOC breakthrough is detected, the waste gas flow shall be directed to a portable dual carbon system while the saturated carbon is replaced with fresh carbon. Sufficient fresh activated carbon shall be maintained at the site such that spent carbon can be replaced as specified.
 - C. The method of VOC sampling and analysis shall be by photo-ionization detector (PID), Ultraray, or a TCEQ equivalent as approved by the Regional Office. On each day that sampling is to occur, the analyzer shall be calibrated prior to sampling with a certified gas mixture at 100 ppmv \pm 10 percent.
 - D. Records of the carbon canister monitoring maintained at the plant site shall include (but are not limited to) the following:
 - (1) Monitoring results;
 - (2) Corrective action taken (including the time and date of that action) when breakthrough occurs; and
 - (3) Process operations at the time that breakthrough occurs. (3/08)
48. The following requirements apply to capture systems for the plant flare system.
- A. Either conduct a once a month visual, audible, and/or olfactory inspection of the capture system to verify there are no leaking components in the capture system; or verify the capture system is leak-free by inspecting in accordance with 40 CFR Part 60, Appendix A, Test Method 21 once a year. Leaks shall be indicated by an instrument reading greater than or equal to 500 ppmv above background.

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- B. The control device shall not have a bypass.

or

If there is a bypass for the control device, comply with either of the following requirements:

- (1) Install a flow indicator that records and verifies zero flow at least once every 15 minutes immediately downstream of each valve that if opened would allow a vent stream to bypass the control device and be emitted, either directly or indirectly, to the atmosphere; or
- (2) Once a month, inspect the valves, verifying the position of the valves and the condition of the car seals that prevent flow out the bypass.

A bypass does not include authorized analyzer vents, highpoint bleeder vents, low point drains, conservation vents on tanks, or rupture discs upstream of pressure relief valves if the pressure between the disc and relief valve is monitored and recorded at least weekly. A deviation shall be reported if the monitoring or inspections indicate bypass of the control device when it is required to be in service.

- C. If any of the above inspections is not satisfactory, the permit holder shall promptly take necessary corrective action. Records shall be maintained documenting the performance and results of the inspections required above. (8/10)

LEAK DETECTION AND REPAIR (LDAR) PROGRAMS

49. Piping, Valves, Connectors, Pumps, and Compressors in VOC Service - 28 RCT (10/10)

The requirements below shall apply to fugitive components at Tanks 269, 1023, and 1051; Fluid Catalytic Cracking Units (FCCUs) 1 and 3; DDU 100 and 200; HUF Fractionator, CFHU, Sulfur Recovery Unit (SRU, RDU, and Marine Docks. This condition shall remain in effect until July 13, 2010. After July 13, 2010, the fugitive components from these units shall comply with the requirements of Special Condition No. 51.

- A. These conditions shall not apply (1) where the VOC has an aggregate partial pressure or vapor pressure equal to or less than 0.044 psia at 68°F or (2) operating pressure is at least 5 kilopascals (0.725 psi) below ambient pressure. Equipment excluded from this condition shall be identified in a list to be made available upon request.

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- B. Construction of new and reworked piping, valves, pump systems, and compressor systems shall conform to applicable American National Standards Institute (ANSI), API, American Society of Mechanical Engineers (ASME), or equivalent codes.
- C. New and reworked underground process pipelines shall contain no buried valves such that fugitive emission monitoring is rendered impractical.
- D. To the extent that good engineering practice will permit, new and reworked valves and piping connections shall be so located to be reasonably accessible for leak-checking during plant operation. Non-accessible valves, as defined by 30 TAC Chapter 115, shall be identified in a list to be made available upon request.
- E. New and reworked piping connections shall be welded or flanged. Screwed connections are permissible only on piping smaller than two-inch diameter. No later than the next scheduled quarterly monitoring after initial installation or replacement, all new or reworked connections shall be gas-tested or hydraulically-tested at no less than normal operating pressure and adjustments made as necessary to obtain leak-free performance. Connectors shall be inspected by visual, audible, and/or olfactory means at least weekly by operating personnel walk-through.

Each open-ended valve or line shall be equipped with an appropriately sized cap, blind flange, plug, or a second valve to seal the line. Except during sampling, both valves shall be closed. If the removal of a component for repair or replacement results in an open-ended line or valve, it is exempt from the requirement to install a cap, blind flange, plug, or second valve for 72 hours. If the repair or replacement is not completed within 72 hours, the line or valve must have a cap, blind flange, plug, or second valve installed, or the open-ended valve or line shall be monitored for leaks above background within 72 hours. The open-ended valve or line shall be monitored weekly thereafter with an approved gas analyzer and the results recorded. Leakage indicated by readings above background must be repaired within 24 hours or a cap, blind flange, plug, or second valve must be installed on the line or valve.

- F. Accessible valves shall be monitored by leak-checking for fugitive emissions at least quarterly using an approved gas analyzer. Sealless/leakless valves (including, but not limited to, welded bonnet bellows and diaphragm valves) and relief valves equipped with a rupture disc upstream or venting to a control device are not required to be monitored. For valves equipped with rupture discs, a pressure-sensing device shall be installed between the relief valve and rupture disc to monitor disc integrity. All leaking discs shall be replaced at the earliest opportunity but no later than the next process shutdown.

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An approved gas analyzer shall conform to requirements listed in 40 CFR § 60.485(a) - (b).

Replaced components shall be re-monitored within 15 days of being placed back into VOC service.

- G. Except as may be provided for in the special conditions of this permit, all pump and compressor seals shall be monitored with an approved gas analyzer at least quarterly or be equipped with a shaft sealing system that prevents or detects emissions of VOC from the seal. Seal systems designed and operated to prevent emissions or seals equipped with an automatic seal failure detection and alarm system need not be monitored. These seal systems may include (but are not limited to) dual pump seals with barrier fluid at higher pressure than process pressure, seals degassing to vent control systems kept in good working order, or seals equipped with an automatic seal failure detection and alarm system. Submerged pumps or sealless pumps (including, but not limited to, diaphragm, canned, or magnetic-driven pumps) may be used to satisfy the requirements of this condition and need not be monitored.
- H. Damaged or leaking valves or connectors found to be emitting VOC in excess of 500 ppmv or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. Damaged or leaking pump and compressor seals found to be emitting VOC in excess of 10,000 ppmv or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired.
- I. Every reasonable effort shall be made to repair a leaking component, as specified in this paragraph, within 15 days after the leak is found. If the repair of a component would require a unit shutdown, the repair may be delayed until the next scheduled shutdown. All leaking components which cannot be repaired until a scheduled shutdown shall be identified for such repair by tagging. At the discretion of the TCEQ Executive Director or his designated representative, early unit shutdown or other appropriate action may be required based on the number and severity of tagged leaks awaiting shutdown.
- J. The results of the required fugitive instrument monitoring and maintenance program shall be made available to the TCEQ Executive Director or designated representative upon request. Records shall indicate appropriate dates, test methods, instrument readings, repair results, justification for delay of repairs, and corrective actions taken for all components. Records of physical inspections are not required unless a leak is detected.

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- K. Fugitive emission monitoring required by 30 TAC Chapter 115 may be used in lieu of Items F through I of this condition.
- L. Compliance with the requirements of this condition does not assure compliance with requirements of an applicable NSPS or an applicable NESHAPS and does not constitute approval of alternative standards for these regulations.

50. Piping, Valves, Connectors, Pumps, and Compressors in Service - Intensive Directed Maintenance - 28MID (8/10)

The requirements below shall apply to fugitive components at DDU 300. This condition shall remain in effect until July 13, 2010. After July 13, 2010, the fugitive components from DDU 300 shall comply with the requirements of Special Condition No. 51.

- A. These conditions shall not apply (1) where the concentration in the stream is less than 5 percent by weight or (2) where the VOC has an aggregate partial pressure or vapor pressure of less than 0.044 psia at 68°F or (3) operating pressure is at least 5 kilopascals (0.725 psi) below ambient pressure. Equipment excluded from this condition shall be identified in a list to be made available upon request.
- B. Construction of new and reworked piping, valves, pump systems, and compressor systems shall conform to applicable ANSI, API, ASME, or equivalent codes.
- C. New and reworked underground process pipelines shall contain no buried valves such that fugitive emission monitoring is rendered impractical.
- D. To the extent that good engineering practice will permit, new and reworked valves and piping connections shall be so located to be reasonably accessible for leak-checking during plant operation. Non-accessible valves, as defined by 30 TAC Chapter 115, shall be identified in a list to be made available upon request.
- E. New and reworked piping connections shall be welded or flanged. Screwed connections are permissible only on piping smaller than two-inch diameter. No later than the next scheduled quarterly monitoring after initial installation or replacement, all new or reworked connections shall be gas-tested or hydraulically-tested at no less than normal operating pressure and adjustments made as necessary to obtain leak-free performance. Connectors shall be inspected by visual, audible, and/or olfactory means at least weekly by operating personnel walk-through.

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Each open-ended valve or line shall be equipped with an appropriately sized cap, blind flange, plug, or a second valve to seal the line. Except during sampling, both valves shall be closed. If the removal of a component for repair or replacement results in an open-ended line or valve, it is exempt from the requirement to install a cap, blind flange, plug, or second valve for 72 hours. If the repair or replacement is not completed within 72 hours, the line or valve must have a cap, blind flange, plug, or second valve installed, or the open-ended valve or line shall be monitored for leaks above background within 72 hours. The open-ended valve or line shall be monitored weekly thereafter with an approved gas analyzer and the results recorded. Leakage indicated by readings above background must be repaired within 24 hours or a cap, blind flange, plug, or second valve must be installed on the line or valve.

- F. Accessible valves shall be monitored by leak-checking for fugitive emissions at least quarterly using an approved gas analyzer with a directed maintenance program. Sealless/leakless valves (including, but not limited to, welded bonnet bellows and diaphragm valves) and relief valves equipped with a rupture disc upstream or venting to a control device are not required to be monitored. For valves equipped with rupture discs, a pressure-sensing device shall be installed between the relief valve and rupture disc to monitor disc integrity. All leaking discs shall be replaced at the earliest opportunity but no later than the next process shutdown.

An approved gas analyzer shall conform to requirements listed in 40 CFR § 60.485(a) - (b).

A directed maintenance program shall consist of the repair and maintenance of components assisted simultaneously by the use of an approved gas analyzer such that a minimum concentration of leaking VOC is obtained for each component being maintained. Replaced components shall be re-monitored within 15 days of being placed back into VOC service.

- G. All new and replacement pumps and compressors shall be equipped with a shaft sealing system that prevents or detects emissions of VOC from the seal. These seal systems need not be monitored and may include (but are not limited to) dual pump seals with barrier fluid at higher pressure than process pressure, seals degassing to vent control systems kept in good working order, or seals equipped with an automatic seal failure detection and alarm system. Submerged pumps or sealless pumps (including, but not limited to, diaphragm, canned, or magnetic-driven pumps) may be used to satisfy the requirements of this condition and need not be monitored.

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All other pump and compressor seals emitting VOC shall be monitored with an approved gas analyzer at least quarterly.

- H. Damaged or leaking valves, connectors, compressor seals, and pump seals found to be emitting VOC in excess of 500 ppmv or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. Every reasonable effort shall be made to repair a leaking component, as specified in this paragraph, within 15 days after the leak is found. If the repair of a component would require a unit shutdown, the repair may be delayed until the next scheduled shutdown. All leaking components which cannot be repaired until a scheduled shutdown shall be identified for such repair by tagging. At the discretion of the TCEQ Executive Director or designated representative, early unit shutdown or other appropriate action may be required based on the number and severity of tagged leaks awaiting shutdown.

- I. In lieu of the monitoring frequency specified in Paragraph F of this condition, valves in gas and light liquid service may be monitored on a semiannual basis if the percent of valves leaking for two consecutive quarterly monitoring periods is less than 0.5 percent.

Valves in gas and light liquid service may be monitored on an annual basis if the percent of valves leaking for two consecutive semiannual monitoring periods is less than 0.5 percent.

If the percent of valves leaking for any semiannual or annual monitoring period is 0.5 percent or greater, the facility shall revert to quarterly monitoring until the facility again qualifies for the alternative monitoring schedules previously outlined in this paragraph.

- J. The percent of valves leaking used in Paragraph I shall be determined using the following formula:

$$(V_l + V_s) \times 100 / V_t = V_p$$

Where:

V_l = the number of valves found leaking by the end of the monitoring period, either by Method 21 or sight, sound, and smell.

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Vs = the number of valves for which repair has been delayed and are listed on the facility shutdown log.

Vt = the total number of valves in the facility subject to the monitoring requirements, as of the last day of the monitoring period, not including nonaccessible and unsafe-to-monitor valves.

Vp = the percentage of leaking valves for the monitoring period.

- K. The results of the required fugitive instrument monitoring and maintenance program shall be made available to the TCEQ Executive Director or designated representative upon request. Records shall indicate appropriate dates, test methods, instrument readings, repair results, justification for delay of repairs, and corrective actions taken for all components. Records of physical inspections are not required unless a leak is detected.
- L. Compliance with the requirements of this condition does not assure compliance with requirements of 30 TAC Chapter 115, an applicable NSPS, or an applicable NESHAPS and does not constitute approval of alternative standards for these regulations. Shutdown shall be identified for such repair by tagging. At the discretion of the TCEQ Executive Director or designated representative, early unit shutdown or other appropriate action may be required based on the number and severity of tagged leaks awaiting shutdown.

51. Piping, Valves, Connectors, Pumps, and Compressors in VOC Service - 28VHP (8/10)

Except as may be provided for in the special conditions of this permit, the following requirements apply to all fugitive components at the units authorized under this permit on July 13, 2010:

- A. These conditions shall not apply (1) where the VOC has an aggregate partial pressure or vapor pressure of less than 0.044 psia at 68°F or (2) to piping and valves two inches nominal size and smaller or (3) operating pressure is at least 5 kilopascals (0.725 psi) below ambient pressure. Equipment excluded from this condition shall be identified in a list to be made available upon request.
- B. Construction of new and reworked piping, valves, pump systems, and compressor systems shall conform to applicable ANSI, API, ASME, or equivalent codes.

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- C. New and reworked underground process pipelines shall contain no buried valves such that fugitive emission monitoring is rendered impractical.
- D. To the extent that good engineering practice will permit, new and reworked valves and piping connections shall be so located to be reasonably accessible for leak-checking during plant operation. Non-accessible valves, as defined by 30 TAC Chapter 115, shall be identified in a list to be made available upon request.
- E. New and reworked piping connections shall be welded or flanged. Screwed connections are permissible only on piping smaller than two-inch diameter. No later than the next scheduled quarterly monitoring after initial installation or replacement, all new or reworked connections shall be gas-tested or hydraulically-tested at no less than normal operating pressure and adjustments made as necessary to obtain leak-free performance. Connectors shall be inspected by visual, audible, and/or olfactory means at least weekly by operating personnel walk-through.

Each open-ended valve or line shall be equipped with an appropriately sized cap, blind flange, plug, or a second valve to seal the line. Except during sampling, both valves shall be closed. If the removal of a component for repair or replacement results in an open-ended line or valve, it is exempt from the requirement to install a cap, blind flange, plug, or second valve for 72 hours. If the repair or replacement is not completed within 72 hours, the line or valve must have a cap, blind flange, plug, or second valve installed, or the open-ended valve or line shall be monitored for leaks above background within 72 hours. The open-ended valve or line shall be monitored weekly thereafter with an approved gas analyzer and the results recorded. Leakage indicated by readings above background must be repaired within 24 hours or a cap, blind flange, plug, or second valve must be installed on the line or valve.

- F. Accessible valves shall be monitored by leak-checking for fugitive emissions at least quarterly using an approved gas analyzer. Sealless/leakless valves (including, but not limited to, welded bonnet bellows and diaphragm valves) and relief valves equipped with a rupture disc upstream or venting to a control device are not required to be monitored. For valves equipped with rupture discs, a pressure-sensing device shall be installed between the relief valve and rupture disc to monitor disc integrity. All leaking discs shall be replaced at the earliest opportunity but no later than the next process shutdown.

An approved gas analyzer shall conform to requirements listed in 40 CFR § 60.485(a) - (b).

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Replaced components shall be re-monitored within 15 days of being placed back into VOC service.

- G. Except as may be provided for in the special conditions of this permit, all pump and compressor seals shall be monitored with an approved gas analyzer at least quarterly or be equipped with a shaft sealing system that prevents or detects emissions of VOC from the seal. Seal systems designed and operated to prevent emissions or seals equipped with an automatic seal failure detection and alarm system need not be monitored. These seal systems may include (but are not limited to) dual pump seals with barrier fluid at higher pressure than process pressure, seals degassing to vent control systems kept in good working order, or seals equipped with an automatic seal failure detection and alarm system. Submerged pumps or sealless pumps (including, but not limited to, diaphragm, canned, or magnetic-driven pumps) may be used to satisfy the requirements of this condition and need not be monitored.
- H. Damaged or leaking valves or connectors found to be emitting VOC in excess of 500 ppmv or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. Damaged or leaking pump and compressor seals found to be emitting VOC in excess of 2,000 ppmv or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired.
- I. Every reasonable effort shall be made to repair a leaking component, as specified in this paragraph, within 15 days after the leak is found. If the repair of a component would require a unit shutdown, the repair may be delayed until the next scheduled shutdown. All leaking components which cannot be repaired until a scheduled shutdown shall be identified for such repair by tagging. At the discretion of the TCEQ Executive Director or designated representative, early unit shutdown or other appropriate action may be required based on the number and severity of tagged leaks awaiting shutdown.
- J. The results of the required fugitive instrument monitoring and maintenance program shall be made available to the TCEQ Executive Director or designated representative upon request. Records shall indicate appropriate dates, test methods, instrument readings, repair results, justification for delay of repairs, and corrective actions taken for all components. Records of physical inspections are not required unless a leak is detected.

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- K. Alternative monitoring frequency schedules of 30 TAC §§ 115.352 - 115.359 or National Emission Standards for Organic Hazardous Air Pollutants, 40 CFR Part 63, Subpart H, may be used in lieu of Paragraphs F through G of this condition.
- L. Compliance with the requirements of this condition does not assure compliance with requirements of 30 TAC Chapter 115, an applicable NSPS, or an applicable NESHAPS and does not constitute approval of alternative standards for these regulations.
52. All process drains shall be instrument-monitored with an approved gas analyzer on an annual basis using a 500 ppmv leak definition. The gas analyzer shall conform to the requirements listed in 40 CFR § 60.485(a)-(b).
53. Ambient H₂S monitors shall be placed through the sulfur recovery, amine regeneration, and sour water stripper areas. These monitors shall be arranged in such a way that coverage is provided for all wind directions. The monitors shall be set to alarm at 10 ppmv and shall alarm in the control room. A plot identifying the number and location of each monitor shall be maintained in the control room handling each one of the areas described above.
54. Piping, Valves, Pumps, and Compressors in Ammonia (NH₃), H₂S, , SO₂, (10/10)
- A. Audio, olfactory, and visual checks for NH₃, H₂S, SO₂, and leaks within the following operating areas shall be made once per shift (once every 12 hours):

Pollutant(s)	Operating Area(s)
NH ₃	Aqueous ammonia storage and piping
H ₂ S and SO ₂	SRU, sour water stripper area, amine contactor and regenerator, and hydrotreater areas handling H ₂ S and SO ₂

- B. Immediately, but no later than one hour upon detection of a leak, plant personnel shall:
- (1) Stop the leak by taking the equipment out of service, or
 - (2) Bypass the equipment so that it is no longer in service, or
 - (3) Isolate the leak, or
 - (4) Commence repair or replacement of the leaking component.

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If the leak cannot be repaired within six hours, the holder of this permit shall use clamping procedures to prevent the leak until replacement or repair can be performed.

Records shall be maintained at the plant site of all repairs and replacements made due to leaks. A reminder that visual checks for NH_3 , H_2S , SO_2 , and leaks need to be made once per shift shall be included in the appropriate unit operator manual no later than September 13, 2005. (8/10)

EMISSION CAP COMPLIANCE RECORDKEEPING

55. The holder of this permit shall use continuous emissions data, sampling data, firing rates, throughput, fill rates, etc, to perform emission calculations at least once every month in order to verify compliance with the annual (TPY) emission caps. The holder of this permit shall maintain all records necessary to demonstrate compliance with the short-term (lb/hr) and TPY emissions caps and individual emission limitations and provide such demonstration of compliance to the TCEQ or local air pollution control program representatives upon request.

If any information obtained from parameter monitoring (throughput, pump rates, etc.), sampling data or continuous emission monitor (CEM) data indicates that a facility is exceeding its proposed contribution to the emissions cap (lb/hr and/or TPY), the holder of this permit shall provide adequate information to demonstrate that the lb/hr and/or TPY emissions caps were not exceeded, and that the BACT representations for the facilities contributing to the emissions CAP is being met.

For the time period between July 13, 2005, and July 31, 2005, the facilities contained in this flexible permit will show compliance with their individual emission limitations in accordance with their respective authorization, e.g., permit, exemption, permit-by-rule.

For the time period August 1, 2005 through July 31, 2006, compliance with emissions caps and individual emission limitations will be on an apportioned calendar basis (apportioned meaning that each month is allotted 1/12th of the annual emissions cap or individual emission limitation).

After July 31, 2006, compliance with the annual emission caps and individual emission limitations of this flexible permit shall be based on a rolling 12-month basis. (8/10)

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56. Emissions from sources covered under this permit shall be determined as follows. If a source type is not listed below, the permit holder shall use the methodology which was used in the permit application.

Atmospheric Storage Tanks: Emissions for tanks shall be calculated using: (a) AP-42 A Compilation of Air Pollution Emission Factors, Chapter 7 - Storage of Organic Liquids and (b) the TCEQ publication titled "Technical Guidance Package for Chemical Sources - Storage Tanks." Short-term emission rate shall be based on the maximum expected pumping rate (fixed-roof) and the higher of the pumping rate or withdrawal rate (IFR and EFR).

Marine Loading: AP-42 Chapter 5.2-4 (Fifth Edition) L_L Equation - The collection efficiency is 100 percent collection (vacuum loading system) for all compounds equal to or greater than 0.5 psia.

Piping Fugitives: Component counts, emission factors, and reduction credits specified in the permit application for the various inspection and maintenance programs.

Boilers and Heaters: CEM information if such a device is installed. The most recent stack test results if a CEM is not installed. If no stack sampling is required, use the proper emission factor for the specific unit and the measured Btu value and flow rate of the fuel.

SRU and FCCU: CEM information. Use the most recent stack test for those compounds which are not subject to CEM requirements. (10/10)

MAINTENANCE, STARTUP, AND SHUTDOWN (MSS) ACTIVITIES

57. This permit authorizes the emissions from the facilities identified in Attachment D for the planned maintenance, startup, and shutdown (MSS) activities summarized in the MSS Activity Summary (Attachment C) attached to this permit.

Attachment A identifies the inherently low emitting MSS activities that may be performed at the refinery. Emissions from activities identified in Attachment A shall be considered to be equal to the potential to emit represented in the permit application. The estimated emissions from the activities listed in Attachment A must be revalidated annually. This revalidation shall consist of the estimated emissions for each type of activity and the basis for that emission estimate.

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Routine maintenance activities, as identified in Attachment B may be tracked through the work orders or equivalent. Emissions from activities identified in Attachment B shall be calculated using the number of work orders or equivalent that month and the emissions associated with that activity identified in the permit application.

The performance of each planned MSS activity not identified in Attachments A or B and the emissions associated with it shall be recorded and include at least the following information:

- A. The process unit at which emissions from the MSS activity occurred, including the emission point number and common name of the process unit;
- B. The type of planned MSS activity and the reason for the planned activity;
- C. The common name and the facility identification number, if applicable, of the facilities at which the MSS activity and emissions occurred;
- D. The date and time of the MSS activity and its duration;
- E. The estimated quantity of each air contaminant, or mixture of air contaminants, emitted with the data and methods used to determine it. The emissions shall be estimated using the methods identified in the permit application, consistent with good engineering practice.

All MSS emissions authorized by this permit shall be summed monthly and the rolling 12-month emissions shall be updated on a monthly basis. (8/10)

58. Process units and facilities, with the exception of those identified in Special Condition Nos. 61, 62, 64, and Attachment A shall be depressurized, emptied, degassed, and placed in service in accordance with the following requirements.
- A. The process equipment shall be depressurized to a control device or a controlled recovery system prior to venting to atmosphere, degassing, or draining liquid. Equipment that only contains material that is liquid with VOC partial pressure less than 0.50 psi at the normal process temperature and 95°F may be opened to atmosphere and drained in accordance with Paragraph C of this condition. The vapor pressure at 95°F may be used if the actual temperature of the liquid is verified to be less than 95°F and the temperature is recorded.

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- B. If mixed phase materials must be removed from process equipment, the cleared material shall be routed to a knockout drum or equivalent to allow for managed initial phase separation. If the VOC partial pressure is greater than 0.50 psi at either the normal process temperature or 95°F, any vents in the system must be routed to a control device or a controlled recovery system. The vapor pressure at 95°F may be used if the actual temperature of the liquid is verified to be less than 95°F and the temperature is recorded. Control must remain in place until degassing has been completed or the system is no longer vented to atmosphere.
- C. All liquids from process equipment or storage vessels must be removed to the maximum extent practical prior to opening equipment to commence degassing and/or maintenance. Liquids must be drained into a closed vessel unless prevented by the physical configuration of the equipment. If it is necessary to drain liquid into an open pan or sump, the liquid must be covered or transferred to a covered vessel within one hour of being drained.
- D. If the VOC partial pressure is greater than 0.50 psi at the normal process temperature or 95°F, facilities shall be degassed using good engineering practice to ensure air contaminants are removed from the system through the control device or controlled recovery system to the extent allowed by process equipment or storage vessel design. The vapor pressure at 95°F may be used if the actual temperature of the liquid is verified to be less than 95°F and the temperature is recorded. The facilities to be degassed shall not be vented directly to atmosphere, except as necessary to establish isolation of the work area or to monitor VOC concentration following controlled depressurization. The venting shall be minimized to the maximum extent practicable and actions taken recorded. The control device or recovery system utilized shall be recorded with the estimated emissions from controlled and uncontrolled degassing calculated using the methods that were used to determine allowable emissions for the permit application.
 - (1) For MSS activities identified in Attachment B, the following option may be used in lieu of Paragraph D(2) of this condition. The facilities being prepared for maintenance shall not be vented directly to atmosphere, except as necessary to verify an acceptable VOC concentration and establish isolation of the work area, until the VOC concentration has been verified to be less than 10 percent of the lower explosive limit (LEL) (or equivalent) per the site safety procedures.
 - (2) The locations and/or identifiers where the purge gas or steam enters the process equipment or storage vessel and the exit points for the exhaust gases shall be recorded (PFD's or P&ID's may be used to demonstrate compliance with the

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requirement). Documented refinery procedures used to deinventory equipment to a control device for safety purposes (i.e., hot work or vessel entry procedures) that achieve at least the same level of purging may be used in lieu of the above. If the process equipment is purged with a gas, purge gas must have passed through the control device or controlled recovery system for a sufficient period of time in accordance with the applicable site operating procedures before the vent stream may be sampled to verify acceptable VOC concentration prior to uncontrolled venting. The VOC sampling and analysis shall be performed using an instrument meeting the requirements of Special Condition No. 59. The sampling point shall be upstream of the inlet to the control device or controlled recovery system. The sample locations and collection systems must be located downstream of the process equipment or vessel being purged. The facilities shall be degassed to a control device or controlled recovery system until the VOC concentration is less than or equal to 10,000 ppmv or 10 percent of the LEL.

E. Gases and vapors with VOC partial pressure greater than 0.50 psi may be vented directly to atmosphere if all the following criteria are met:

- (1) It is not technically practicable to depressurize or degas, as applicable, into the process.
- (2) There is not an available connection to a plant control system (flare).
- (3) There is no more than 50 lb of air contaminant to be vented to atmosphere during shutdown or startup, as applicable.

All instances of venting directly to atmosphere per Paragraph E of Special Condition No. 58 must be documented when occurring as part of any MSS activity. The emissions associated with venting without control must be included in the work order or equivalent for those planned MSS activities identified in Attachment B. (8/10)

59. Air contaminant concentration shall be measured using an instrument/detector meeting one set of requirements specified below.

A. VOC concentration shall be measured using an instrument meeting all the requirements specified in EPA Method 21 (40 CFR 60, Appendix A) with the following exceptions:

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- (1) The instrument shall be calibrated within 24 hours of use with a calibration gas such that the response factor of the VOC (or mixture of VOCs) to be monitored shall be less than 2.0. The calibration gas and the gas to be measured, and its approximate response factor shall be recorded.
 - (2) Sampling shall be performed as directed by this permit in lieu of section 8.3 of Method 21. During sampling, data recording shall not begin until after two times the instrument response time. The date and time shall be recorded, and VOC concentration shall be monitored for at least five minutes, recording VOC concentration each minute. The highest measured VOC concentration shall not exceed the specified VOC concentration limit prior to uncontrolled venting.
- B. Colorimetric gas detector tubes may be used to determine air contaminant concentrations if they are used in accordance with the following requirements.
- (1) The air contaminant concentration measured is less than 80 percent of the range of the tube. If the maximum range of the tube is greater than the release concentration defined in Subparagraph (3) of this condition, the concentration measured is at least 20 percent of the maximum range of the tube.
 - (2) The tube is used in accordance with the manufacturer's guidelines.
 - (3) At least 2 samples taken at least 5 minutes apart must satisfy the following prior to uncontrolled venting:

measured contaminant concentration (ppmv) less than release concentration.

Where the release concentration is:

10,000* mole fraction of the total air contaminants present that can be detected by the tube.

The mole fraction may be estimated based on process knowledge. The release concentration and basis for its determination shall be recorded.

Records shall be maintained of the tube type, range, measured concentrations, and time the samples were taken.

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- C. Lower explosive limit measured with a lower explosive limit detector.
 - (1) The detector shall be calibrated monthly with a certified pentane gas standard at 25 percent of the lower explosive limit (LEL) for pentane. Records of the calibration date/time and calibration result (pass/fail) shall be maintained.
 - (2) A daily functionality test shall be performed on each detector using the same certified gas standard used for calibration. The LEL monitor shall read no lower than 90 percent of the calibration gas certified value. Records, including the date/time and test results, shall be maintained.
 - (3) A certified methane gas standard equivalent to 25 percent of the LEL for pentane may be used for calibration and functionality tests provided that the LEL response is within 95 percent of that for pentane. (8/10)
- 60. Each open-ended valve or line shall be equipped with an appropriately sized cap, blind flange, plug, or a second valve to seal the line. Except during sampling, both valves shall be closed. If the removal of a component for repair or replacement results in an open-ended line or valve, it is exempt from the requirement to install a cap, blind flange, plug, or second valve for 72 hours. If the repair or replacement is not completed within 72 hours, the permit holder must complete either of the following actions within that time period;
 - A. a cap, blind flange, plug, or second valve must be installed on the line or valve; or
 - B. the open-ended valve or line shall be monitored once for leaks above background for a plant or unit turnaround lasting up to 45 days with an approved gas analyzer and the results recorded. For all other situations, the open-ended valve or line shall be monitored once at the end of the 72 hour period following the creation of the open ended line and monthly thereafter with an approved gas analyzer and the results recorded. For turnarounds and all other situations, leaks are indicated by readings 20 ppmv above background and must be repaired within 24 hours or a cap, blind flange, plug, or second valve must be installed on the line or valve. (8/10)
- 61. This permit authorizes emissions from the storage tanks identified in Attachment D during planned floating roof landings. Tank roofs may only be landed for changes of tank service or tank inspection/maintenance as identified in the permit application. Tank change of service includes landings to accommodate seasonal RVP spec changes and landings to correct off-spec material that cannot be blended into finished product tanks. Emissions from change of service tank landings shall not exceed 10 tons of VOC in any rolling

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12-month period. Tank roof landings include all operations when the tank floating roof is on its supporting legs. These emissions are subject to the maximum allowable emission rates indicated on the ECIELT. The following requirements apply to tank roof landings.

- A. The tank liquid level shall be continuously lowered after the tank floating roof initially lands on its supporting legs until the tank has been drained to the maximum extent practicable without entering the tank. Liquid level may be maintained steady for a period of up to two hours if necessary to allow for valve lineups and pump changes necessary to drain the tank. This requirement does not apply where the vapor under a floating roof is routed to control or a controlled recovery system during this process.
- B. If the VOC partial pressure of the liquid previously stored in the tank is greater than 0.50 psi at 95°F, tank refilling or degassing of the vapor space under the landed floating roof must begin within 24 hours after the tank has been drained unless the vapor under the floating roof is routed to control or a controlled recovery system during this period. Floating roof tanks with liquid capacities less than 100,000 gallons may be degassed without control if the VOC partial pressure of the standing liquid in the tank has been reduced to less than 0.02 psia prior to ventilating the tank. Controlled degassing of the vapor space under landed roofs shall be completed as follows:
 - (1) Any gas or vapor removed from the vapor space under the floating roof must be routed to a control device or a controlled recovery system and controlled degassing must be maintained until the VOC concentration is less than 10,000 ppmv or 10 percent of the LEL. The locations and identifiers of vents other than permanent roof fittings and seals, control device or controlled recovery system, and controlled exhaust stream shall be recorded. There shall be no other gas/vapor flow out of the vapor space under the floating roof when degassing to the control device or controlled recovery system.
 - (2) The vapor space under the floating roof shall be vented using good engineering practice to ensure air contaminants are flushed out of the tank through the control device or controlled recovery system to the extent allowed by the storage tank design.
 - (3) A volume of purge gas equivalent to twice the volume of the vapor space under the floating roof must have passed through the control device or into a controlled recovery system, before the vent stream may be sampled to verify acceptable VOC concentration. The measurement of purge gas volume shall

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not include any make-up air introduced into the control device or recovery system. The VOC sampling and analysis shall be performed as specified in Special Condition No. 59.

- (4) The sampling point shall be upstream of the inlet to the control device or controlled recovery system. The sample ports and the collection system must be designed and operated such that there is no air leakage into the sample probe or the collection system downstream of the process equipment or vessel being purged.
 - (5) Degassing must be performed every 24 hours unless there is no standing liquid in the tank or the VOC partial pressure of the remaining liquid in the tank is less than 0.15 psia.
- C. The tank shall not be opened or ventilated without control, except as allowed by (1) or (2) below until one of the criteria in Paragraph D of this condition is satisfied.
- (1) Minimize air circulation in the tank vapor space.
 - a. One manway may be opened to allow access to the tank to remove or de-volatilize the remaining liquid. Other manways or access points may be opened as necessary to remove or de-volatilize the remaining liquid. Wind barriers shall be installed at all open manways and access points to minimize air flow through the tank.
 - b. Access points shall be closed when not in use.
 - (2) Minimize time and VOC partial pressure.
 - a. The VOC partial pressure of the liquid remaining in the tank shall not exceed 0.044 psi as documented by the method specified in Paragraph D(1) of this condition;
 - b. Blowers may be used to move air through the tank without emission control at a rate not to exceed 12,000 cubic feet per minute for no more than 12 hours. All standing liquid shall be removed from the tank during this period; and

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- c. Records shall be maintained of the blower circulation rate, the duration of uncontrolled ventilation, and the date and time all standing liquid was removed from the tank.
- D. The tank shall not be opened except as necessary to set up for degassing and cleaning, or ventilated without control, until either all standing liquid has been removed from the tank or the liquid in the tank has a VOC partial pressure less than 0.02 psia. These criteria may be demonstrated in any one of the following ways.
 - (1) Low VOC partial pressure liquid that is soluble with the liquid previously stored may be added to the tank to lower the VOC partial pressure of the liquid mixture remaining in the tank to less than 0.02 psia. This liquid shall be added during tank degassing if practicable. The estimated volume of liquid remaining in the drained tank and the volume and type of liquid added shall be recorded. The liquid VOC partial pressure may be estimated based on this information and engineering calculations.
 - (2) If water is added or sprayed into the tank to remove standing VOC, one of the following must be demonstrated:
 - a. Take a representative sample of the liquid remaining in the tank and verify no visible sheen using the static sheen test from 40 CFR 435 Subpart A Appendix 1.
 - b. Take a representative sample of the liquid remaining in the tank and verify hexane soluble VOC concentration is less than 1000 ppmw using EPA Method 1664 (may also use 8260B or 5030 with 8015 from SW-846).
 - c. Stop ventilation and close the tank for at least 24 hours. When the tank manway is opened after this period, verify VOC concentration is less than 1,000 ppmv through the procedure in Special Condition No. 59.
 - (3) No standing liquid verified through visual inspection.

The permit holder shall maintain records to document the method used to release the tank.

- E. Tanks shall be refilled as rapidly as practicable until the roof is off its legs with the following exceptions:

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- (1) Only one benzene tank with a landed floating roof can be filled at any time at a rate not to exceed 1,000 bbl/hr.
 - (2) The vapor space below the tank roof is directed to a control device when the tank is refilled until the roof is floating on the liquid. The control device used and the method and locations used to connect the control device shall be recorded. All vents from the tank being filled must exit through the control device.
- F. The occurrence of each roof landing and the associated emissions shall be recorded and the rolling 12-month tank roof landing emissions shall be updated on a monthly basis. These records shall include at least the following information:
- (1) the identification of the tank and emission point number, and any control devices or recovery systems used to reduce emissions;
 - (2) the reason for the tank roof landing;
 - (3) for the purpose of estimating emissions, the date, time, and other information specified for each of the following events:
 - a. the roof was initially landed,
 - b. all liquid was pumped from the tank to the extent practical,
 - c. start and completion of controlled degassing, and total volumetric flow,
 - d. all standing liquid was removed from the tank or any transfers of low VOC partial pressure liquid to or from the tank including volumes and vapor pressures to reduce tank liquid VOC partial pressure to <0.02 psi,
 - e. if there is liquid in the tank, VOC partial pressure of liquid, start and completion of uncontrolled degassing, and total volumetric flow,
 - f. refilling commenced, liquid filling the tank, and the volume necessary to float the roof; and
 - g. tank roof off supporting legs, floating on liquid.

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- (4) the estimated quantity of each air contaminant, or mixture of air contaminants, emitted between events c and g with the data and methods used to determine it. The emissions associated with roof landing activities shall be calculated using the methods described in Section 7.1.3.2 of AP-42 "Compilation of Air Pollution Emission Factors, Chapter 7 - Storage of Organic Liquids" dated November 2006 and the permit application, PI-1, submitted January 5, 2007. (8/10)
- 62. Storage tanks shall not be ventilated without control, until either all standing liquid has been removed from the tank or the liquid in the tank has a VOC partial pressure less than 0.02 psia. This shall be verified and documented through one of the criteria identified in Paragraph C of Special Condition No. 61. Storage tanks manways may be opened without emission controls when there is standing liquid with a VOC partial pressure greater than 0.02 psi vapor as necessary to set up for degassing and cleaning. One manway may be opened to allow access to the tank to remove or de-volatilize the remaining liquid. The emission control system shall meet the requirements of Subparagraphs B(1) through B(5) of Special Condition No. 61 and records maintained per Subparagraphs E(3)c through E(3)e, and E(4) of Special Condition No. 61. Low vapor pressure liquid may be added to and removed from the tank as necessary to lower the vapor pressure of the liquid mixture remaining in the tank to less than 0.02 psia. (8/10)
- 63. The following requirements apply to vacuum and air mover truck operations to support planned MSS at this site:
 - A. Vacuum pumps and blowers shall not be operated on trucks containing or vacuuming liquids with VOC partial pressure greater than 0.50 psi at 95°F unless the vacuum/blower exhaust is routed to a control device or a controlled recovery system.
 - B. Equip fill line intake with a "duckbill" or equivalent attachment if the hose end cannot be submerged in the liquid being collected.
 - C. A daily record containing the information identified below is required for each vacuum truck in operation at the site each day.
 - (1) Prior to initial use, identify any liquid in the truck. Record the liquid level and document that the VOC partial pressure is less than 0.50 psi if the vacuum exhaust is not routed to a control device or a controlled recovery system. After each liquid transfer, identify the liquid transferred and document that the VOC partial pressure is less than 0.50 psi if the vacuum exhaust is not routed to a control device or a controlled recovery system.

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- (2) For each liquid transfer made with the vacuum operating, record the duration of any periods when air may have been entrained with the liquid transfer. The reason for operating in this manner and whether a "duckbill" or equivalent was used shall be recorded. Short, incidental periods, such as those necessary to walk from the truck to the fill line intake, do not need to be documented.
 - (3) If the vacuum truck exhaust is controlled with a control device other than an engine or oxidizer, VOC exhaust concentration upon commencing each transfer, at the end of each transfer, and as required by Special Condition No. 67, measured using an instrument meeting the requirements of Special Condition No. 59.
 - (4) The volume in the vacuum truck at the end of the day, or the volume unloaded, as applicable.
- D. The permit holder shall determine the vacuum truck emissions each month using the vacuum truck records and the calculation methods utilized in the permit application. If records of the volume of liquid transferred for each pick-up are not maintained, the emissions shall be determined using the physical properties of the liquid vacuumed with the greatest potential emissions. Rolling 12 month vacuum truck emissions shall also be determined on a monthly basis.
- E. If the VOC partial pressure of all the liquids vacuumed into the truck is less than 0.10 psi, this shall be recorded when the truck is unloaded or leaves the plant site and the emissions may be estimated as the maximum potential to emit for a truck in that service as documented in the permit application. The recordkeeping requirements in Paragraphs A through D of this condition do not apply. (8/10)
64. The following requirements apply to frac, or temporary, tanks and vessels used in support of MSS activities.
- A. The exterior surfaces of these tanks/vessels that are exposed to the sun shall be white or aluminum effective May 1, 2013. This requirement does not apply to tanks/vessels that only vent to atmosphere when being filled.
 - B. These tanks/vessels must be covered and equipped with fill pipes that discharge within 6 inches of the tank/vessel bottom.
 - C. These requirements do not apply to vessels storing less than 100 gallons of liquid that are closed such that the vessel does not vent to atmosphere.

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- D. The permit holder shall maintain an emissions record which includes calculated emissions of VOC from all frac tanks during the previous calendar month and the past consecutive 12 month period. The record shall include tank identification number, dates put into and removed from service, control method used, tank capacity and volume of liquid stored in gallons, name of the material stored, VOC molecular weight, and VOC partial pressure at the estimated monthly average material temperature in psia. Filling emissions for tanks shall be calculated using the TCEQ publication titled "Technical Guidance Package for Chemical Sources - Loading Operations" and standing emissions determined using: the TCEQ publication titled "Technical Guidance Package for Chemical Sources - Storage Tanks."
 - E. If the tank/vessel is used to store liquid with VOC partial pressure less than 0.10 psi at 95°F, records may be limited to the days the tank is in service and the liquid stored. Emissions may be estimated based upon the potential to emit as identified in the permit application. (8/10)
65. MSS activities represented in the permit application may be authorized under permit by rule only if the procedures, emission controls, monitoring, and recordkeeping are the same as those required by this permit. (8/10)
66. All permanent facilities must comply with all operating requirements, limits, and representations in the permits identified in Attachment D during planned startup and shutdown unless alternate requirements and limits are identified in this permit. Alternate requirements for emissions from routine emission points are identified below.
- A. Combustion units, with the exception of flares, at this site are exempt from NO_x and CO operating requirements identified in special conditions in other NSR permits during planned startup and shutdown if the following criteria are satisfied.
 - (1) The maximum allowable emission rates in the permit authorizing the facility are not exceeded.
 - (2) The startup period does not exceed 8 hours in duration and the firing rate does not exceed 75 percent of the design firing rate. The time it takes to complete the shutdown does not exceed 4 hours.
 - (3) Control devices are started and operating properly when venting a waste gas stream.

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- B. The limits identified below apply to the operations of the specified facilities during startup and shutdown.

During periods of startup of FCCU-3, the CO emissions are not required to comply with 30 TAC § 117.310(c)(1)(A), 400 ppmv at 3 percent O₂ on a rolling 24-hour average basis. A CO continuous emission monitor must be properly operated and maintained. The emissions during startup can average 1,500 ppmv at 3 percent O₂ on a rolling 24-hour average basis for up to two days.

- C. A record shall be maintained indicating that the start and end times each of the activities identified above occur and documentation that the requirements for each have been satisfied. (8/10)
67. Control devices required by this permit for emissions from planned MSS activities are limited to those types identified in this condition. Control devices shall be operated with no visible emissions except periods not to exceed a total of five minutes during any two consecutive hours. Each device used must meet all the requirements identified for that type of control device.

Controlled recovery systems identified in this permit shall be directed to an operating refinery process or to a collection system that is vented through a control device meeting the requirements of this permit condition.

A. Carbon Adsorption System (CAS). (10/10)

- (1) The CAS shall consist of a dual carbon system with adequate carbon supply for the emission control operation.
- (2) The CAS shall be sampled down stream of the first carbon bed and the concentration recorded at least once every hour of CAS run time to determine breakthrough of the VOC. The sampling frequency may be extended using either of the following methods:
 - a. CAS systems equipped with an upstream liquid scrubber may be sampled once every 12 hours of CAS run time to determine breakthrough.
 - b. Sampling frequency may be extended to up to 30 percent of the minimum potential saturation time for a new can of carbon. The permit holder shall maintain records including the calculations performed to determine the minimum saturation time.

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- c. The carbon sampling frequency may be extended to longer periods based on previous experience with carbon control of a MSS waste gas stream. The past experience must be with the same VOC, type of facility, and MSS activity. The basis for the sampling frequency shall be recorded.
- (3) The method of VOC sampling and analysis shall be by detector meeting the requirements of Special Condition No. 59.
- (4) Breakthrough is defined as the highest measured VOC or benzene concentration at or exceeding 100 ppmv or 5 ppmv, respectively, above background. When the condition of breakthrough of VOC from the initial saturation carbon bed occurs, the waste gas flow shall be switched to a portable dual carbon system and the permanent dual carbon system shall be in place with fresh carbon within 24 hours. In lieu of replacing the dual carbon system, the flow of waste gas may be discontinued until the carbon is replaced. Sufficient new activated carbon shall be maintained at the site to replace spent carbon such that replacements can be done in the above specified time frame.
- (5) Records of CAS monitoring shall include the following:
 - a. Sample time and date.
 - b. Monitoring results (ppmv).
 - c. Canister replacement log.
- (6) Single canister systems are allowed if the time the carbon canister is in service is limited to no more than 30 percent of the minimum potential saturation time. The permit holder shall maintain records for these systems, including the calculations performed to determine the saturation time. The time limit on carbon canister service shall be recorded and the expiration date attached to the carbon can.
- (7) Liquid scrubbers may be used upstream of carbon canisters to enhance VOC capture provided such systems are closed systems and the spent absorbing solution is discharged into a closed container, vessel, or system.

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B. Thermal Oxidizer

- (1) The thermal oxidizer firebox exit temperature shall be maintained at not less than 1,250°F and waste gas flows shall be limited to assure at least a 0.5 second residence time in the fire box while waste gas is being fed into the oxidizer.

The thermal oxidizer combustion chamber exhaust temperature shall be continuously monitored and recorded when waste gas is directed to the oxidizer. The temperature measurements shall be made at intervals of six minutes or less and recorded at that frequency. Temperature measurements recorded in continuous strip charts may be used to meet the requirements of this section.

The temperature measurement device shall be installed, calibrated, and maintained according to accepted practice and the manufacturer's specifications. The device shall have an accuracy of the greater of ± 0.75 percent of the temperature being measured expressed in degrees Celsius or $\pm 2.5^\circ\text{C}$.

- (2) As an alternative to Paragraph B(1) of this condition, the thermal oxidizer may be tested to confirm a minimum of 99 weight percent destruction efficiency. The results of the test will be used to determine the minimum operating temperature and residence time. A stack test must have been performed within the last 12 months. Stack VOC concentrations and flow rates shall be measured in accordance with applicable EPA Reference Methods. A copy of the test report shall be maintained with the thermal oxidizer and a summary of the testing results shall be included with the emission calculations.
- (3) As an alternative to Paragraphs B(1) and B(2) of this condition, the thermal oxidizer may be equipped with continuous VOC monitors (inlet and outlet). The VOC monitors shall be calibrated and maintained in accordance with Special Conditions No. 59, except Paragraph C of Special Condition No. 59. In order to demonstrate compliance with this requirement, inlet VOC and outlet VOC concentrations shall be measured and inlet and outlet VOC mass rates shall be calculated on an hourly basis to confirm minimum 99 weight percents destruction efficiency or an exhaust concentration no greater than 20 ppmv.

C. Internal Combustion Engine.

- (1) The internal combustion engine shall have a VOC destruction efficiency of at least 99 percent.

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- (2) The engine must have been stack tested with butane or propane to confirm the required destruction efficiency within the past 12 months. VOC shall be measured in accordance with the applicable EPA Reference Method during the stack test and the exhaust flow rate may be determined from measured fuel flow rate and measured oxygen concentration. A copy of the stack test report shall be maintained with the engine. There shall also be documentation of acceptable VOC emissions following each occurrence of engine maintenance which may reasonably be expected to increase emissions including oxygen sensor replacement and catalyst cleaning or replacement. Stain tube indicators specifically designed to measure VOC concentration shall be acceptable for this documentation, provided a hot air probe or equivalent device is used to prevent error due to high stack temperature, and three sets of concentration measurements are made and averaged. Portable VOC analyzers meeting the requirements of Special Condition No. 59 are also acceptable for this documentation.

The test period may be extended to 24 months if the engine exhaust is sampled once an hour when waste gas is directed to the engine using a detector meeting the requirements of Special Condition No. 59.A. The sample ports and the collection system must be designed and operated such that there is no air leakage into the sample probe or the collection system downstream of the engine. The concentrations shall be recorded and the MSS activity shall be stopped as soon as possible if the VOC concentration exceeds 100 ppmv above background.

- (3) The engine shall be operated with an oxygen sensor-based air-to-fuel ratio (AFR) controller. Documentation for each AFR controller that the, manufacturer's, or supplier's recommended maintenance has been performed, including replacement of the oxygen sensor as necessary for oxygen sensor-based controllers shall be maintained with the engine. The oxygen sensor shall be replaced at least quarterly in the absence of a specific written recommendation.

D. Flares

- (1) The heating value and velocity requirements in 40 CFR § 60.18 shall be satisfied during operations authorized by this permit.
- (2) The flare shall be operated with a flame present at all times and/or have a constant pilot flame. The pilot flame shall be continuously monitored by a

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thermal couple or an infrared monitor. The time, date, and duration of any loss of pilot flame shall be recorded. Each monitoring device shall be accurate to, and shall be calibrated at a frequency in accordance with, the manufacturer's specifications.

- (3) The permit holder shall either demonstrate 40 CFR § 60.18 BTU requirements are met during the MSS flaring activity using engineering calculations or install a continuous flow monitor and either a composition analyzer that provides a record of the vent stream flow and total VOC content to the flare or a calorimeter that provides a record of the Btu content of the vent stream flow to the flare. The flow monitor sensor and analyzer sample points shall be installed in the vent stream as near as possible to the flare inlet such that the total vent stream to the flare is measured and analyzed. Readings shall be taken at least once every 15 minutes and the average hourly values of the flow and composition or BTU content shall be recorded each hour.

The monitors shall be calibrated on an annual basis to meet the following accuracy specifications: the flow monitor shall be ± 5.0 percent, temperature monitor shall be ± 2.0 percent at absolute temperature, and pressure monitor shall be ± 5.0 mm Hg;

If a total VOC analyzer is installed, calibration of the composition analyzer shall follow the procedures and requirements of Section 10.0 of 40 CFR Part 60, Appendix B, Performance Specification 9, as amended through October 17, 2000 (65 FR 61744), except that the multi-point calibration procedure in Section 10.1 of Performance Specification 9 shall be performed at least once every calendar quarter instead of once every month, and the mid-level calibration check procedure in Section 10.2 of Performance Specification 9 shall be performed at least once every calendar week instead of once every 24 hours. The calibration gases used for calibration procedures shall be in accordance with Section 7.1 of Performance Specification 9. Net heating value of the gas combusted in the flare shall be calculated according to the equation given in 40 CFR § 60.18(f)(3) as amended through October 17, 2000 (65 FR 61744).

If a calorimeter is installed, the calorimeter shall be calibrated, installed, operated, and maintained, in accordance with manufacturer recommendations, to continuously measure and record the net heating value of the gas sent to the flare, in British thermal units/standard cubic foot of the gas.

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The monitors and analyzers shall operate as required by this section at least 95 percent of the time when the flare is operational, averaged over a rolling 12-month period. Flared gas net heating value and actual exit velocity determined in accordance with 40 CFR § 60.18(f)(4) shall be recorded at least once every 15 minutes. If a total VOC analyzer is installed, hourly mass emission rates shall be determined and recorded using the above readings and the emission factors used in the permit amendment application, PI-1 dated January 5, 2007. (8/10)

- E. A liquid scrubbing system may be used upstream of carbon adsorption. A single carbon can or a liquid scrubbing system may be used as the sole control device if the requirements below are satisfied.
- (1) The exhaust to atmosphere shall be monitored continuously and the VOC concentration recorded at least once every 15 minutes when waste gas is directed to the scrubber.
 - (2) The method of VOC sampling and analysis shall be by detector meeting the requirements of Special Condition No. 59A.
 - (3) An alarm shall be installed such that an operator is alerted when outlet VOC concentration exceeds 100 ppmv above background. The MSS activity shall be stopped as soon as possible when the VOC concentration exceeds 100 ppmv above background for more than one minute. The date and time of all alarms and the actions taken shall be recorded.
- F. A closed loop refrigerated vapor recovery system
- (1) The vapor recovery system shall be installed on the facility to be degassed using good engineering practice to ensure air contaminants are flushed from the facility through the refrigerated vapor condensers and back to the facility being degassed. The vapor recovery system and facility being degassed shall be enclosed except as necessary to insure structural integrity (such as roof vents on a floating roof tank).
 - (2) VOC concentration in vapor being circulated by the system shall be sampled and recorded at least once every 4 hours at the inlet of the condenser unit with an instrument meeting the requirements of Special Condition No. 59.

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- (3) The quantity of liquid recovered from the tank vapors and the tank pressure shall be monitored and recorded each hour. The liquid recovered must increase with each reading and the tank pressure shall not exceed one inch water pressure while the system is operating.
68. With the exception of the ECIELT emission limits, Special Condition Nos. 57 through 67 become effective 180 days after the permit amendment received by the TCEQ on January 5, 2007, has been approved. During this period, monitoring and recordkeeping shall satisfy the requirements of Paragraphs A through D of Special Condition No. 57. Emissions shall be estimated using good engineering practice and methods to provide reasonably accurate representations for emissions. The basis used for determining the quantity of air contaminants to be emitted shall be recorded. The permit holder may maintain abbreviated records of emissions from Attachment A and B activities as allowed in Special Condition No. 57 rather than documenting all the information required by Paragraphs A through D of Special Condition No. 57.

OTHER REQUIREMENTS

69. The FCCU1 project authorized by the alteration application, dated October 14, 2010, was determined not to be subject to major new source review by identifying projected actual emission rates for the facilities potentially affected by the project. Projected actual and baseline emission rates for the potentially affected facilities are as follows:

Baseline Actual Emissions (tpy):

EPN	FIN	Permit	CO	NO _x	PM/PM ₁₀	SO ₂	VOC
93	FCCU1	47256	33.98	68.08	139.69	312.56	17.64
80	B501 Furnace	46052	4.33	3.24	1.02	0.60	0.74
521	F1001 Reboiler	9606	0.80	7.54	2.23	1.02	1.61
384	SRU C&D Incin	47256	52.68	30.89	0.00	115.19	4.29
2801-11	Tank 11	47256					15.95
280-181	Tank 181	47256					1.99
280-26	Tank 26	47256					14.27

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Projected Actual Emissions (tpy):

EPN	FIN	Permit	CO	NO _x	PM/PM ₁₀	SO ₂	VOC
93	FCCU1	47256	43.08	72.46	154.55	251.82	22.36
80	B501 Furnace	46052	4.34	3.25	1.02	0.60	0.74
521	F1001 Reboiler	9606	0.81	7.66	2.26	1.03	1.64
384	SRU C&D Incin	47256	52.69	30.89	0.00	115.20	4.29
2801-11	Tank 11	47256					15.95
280-181	Tank 181	47256					1.99
280-26	Tank 26	47256					14.27

Actual emissions from those facilities shall be monitored, recorded and reports made in accordance 30 TAC § 116.121 for the time period specified in 30 TAC § 116.121(b)(1).
(1/11)

Dated January 3, 2011

ATTACHMENT A

Flexible Permit Numbers 47256 and PSDTX402M2

Inherently Low Emitting Activities

Activity	Emissions				
	VOC	NO _x	CO	SO ₂	H ₂ S
Analyzer calibration	X	X	X	X	X
Analyzer filter changeouts	X				X
Carbon canister replacement	X				
Equipment Lubrication (WD-40, etc.)	X				
Injection quill repairs / replacement	X				
Instrumentation repairs / replacement	X				
Meter proving	X				
Process Sampling	X				X
Sight glass or level instrument maintenance / repair / replacement	X				X
Solvent cleaning of fixed, immovable objects	X				

Dated January 3, 2011

ATTACHMENT B

Flexible Permit Numbers 47256 and PSDTX402M2

Routine Maintenance Activities

Planned MSS activities performed with work orders where the isolated system volume is less than 30 cubic feet. These include activities such as:

Pump repair/replacement
Fugitive component (valve, pipe, flange) repair/replacement
Compressor repair/replacement
Heat exchanger repair/replacement
Vessel repair/replacement

Dated January 3, 2011

ATTACHMENT C

Flexible Permit Numbers 47256 and PSDTX402M2

MSS Activity Summary

Facilities	Description	Emissions Activity	EPN or Group
all process units	process unit shutdown/depressurize/drain	vent to Flare or Tail Gas Incinerator	Flares and Incinerators
all process units	process unit purge/degas/drain	vent to atmosphere	F-1000
all process units	process unit startup	vent to Flare or Tail Gas Incinerator	Flares and Incinerators
all process units and storage tanks	preparation for facility/component repair/replacement	vent to Flare or Tail Gas Incinerator	Flares and Incinerators
all process units and storage tanks	preparation for facility/component repair/replacement	vent to atmosphere	F-1000
all process units and storage tanks	recovery from facility / component repair / replacement	vent to flare	Flares and Incinerators
all process units and storage tanks	recovery from facility/component repair/replacement	vent to atmosphere	F-1000
all process units and storage tanks	preparation for unit turnaround or facility/component repair/replacement	remove liquid	F-1000
all floating roof storage tanks	tank roof landing	operation with landed roof	F-1000
all floating roof storage tanks	degas of tank with landed roof	vent to control device	311, 321, 331, 400, TEMP1 and TEMP2
all storage tanks	tank cleaning	cleaning activity and solvents	F-1000
see Attachment A	miscellaneous low emitting activities	see Attachment A	F-1000

Dated January 3, 2011

ATTACHMENT D

Flexible Permit Number 47256 and PSDTX402M2

Facility List

This permit authorizes emissions from the following temporary facilities used to support planned maintenance, startup, and shutdown (MSS) activities at permanent site facilities: frac tanks, containers, vacuum trucks, portable control devices identified in Special Condition No. 67 and controlled recovery systems. Emissions from temporary facilities are authorized provided the temporary facility (a) does not remain on the plant site for more than 12 consecutive months, (b) is used solely to support planned MSS activities at the permanent site facilities listed in this Attachment, and (c) does not operate as a replacement for an existing authorized facility.

This permit authorizes MSS emissions from the permanent site facilities identified below. The headings for each group of facilities (Process Units, Tanks, etc) are used in the MSS Activity Summary to identify all facilities in the respective group.

PROCESS UNITS		
Unit Name	Abbreviation	NSR Permit No.
Alkylate 3 Debutanizer Unit	ALKY3DB	20850
Alkylation Unit No. 2	ALKY2	47256/PSDTX402M2
Alkylation Unit no. 3	ALKY3	9606
Aromatics Recovery Unit	ARU	2231
Aromatics Unit 2	AU2	2612
Cat Feed Hydrotreater Unit	CFHU	47256/PSDTX402M2
Coker Residuum Preheat System	N/A	6592
Coking Complex	Coker	2315
Distillate Desulphurization Unit	DDU	47256/PSDTX402M2
Distillate Ultrafiner Facility	N/A	47256/PSDTX402M2
Docks	Docks	47256/PSDTX402M2
Environmental Facility	ENVF	47256/PSDTX402M2
Fluid Catalytic Cracking Unit 1	FCCU1	47256/PSDTX402M2
Fluid Catalytic Cracking Unit 3	FCCU3	47256/PSDTX402M2
Hydrocarbon Tank 537	N/A	1940
Hydrogen Recovery Unit	HRU	47256/PSDTX402M2
Naphtha Desulphurization Unit	NDU	46052
Pipestills 3A and 3B	PS3A/B	19599
Power Station No. 2	PWRS2	47256/PSDTX402M2
Raffinate Splitter Tower	N/A	47256/PSDTX402M2
Resid Deasphalting Unit	RDU	47256/PSDTX402M2
Resid Hydrotreating Unit	RHU	47256/PSDTX402M2
Sulfur Recovery Unit	SRU	47256/PSDTX402M2

ATTACHMENT D

Flexible Permit Numbers 47256 and PSDTX402M2

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PROCESS UNITS		
Unit Name	Abbreviation	NSR Permit No.
Tank Farm	OMCC	2231 and 47256/PSDTX402M2
Ultracracker Unit	ULC ancillary	2609
Ultraformer Unit No. 3	UU3	47256/PSDTX402M2
Ultraformer Unit No. 4	UU4	6488
Wastewater Treatment Unit	WWTP	22107

FLARES AND INCINERATORS		
Flare or Incinerator Number	EPN	NSR Permit No.
Refinery Flare No. 2	311	47256/PSDTX402M2
Refinery Flare No. 3	321	47256/PSDTX402M2
Refinery Flare No. 4	331	47256/PSDTX402M2
ULC Flare	351A	47256/PSDTX402M2
SRU A/B Flare	381	47256/PSDTX402M2
SRU C/D Flare	383	47256/PSDTX402M2
SRU Incinerator C and D	384	47256/PSDTX402M2
DDU Flare	396A	47256/PSDTX402M2
Flare 8	400	47256/PSDTX402M2
CFHU Flare 1	501	47256/PSDTX402M2
SRU Sour Water System Flare	FLR-SW	47256/PSDTX402M2
Ground Flare #5	TCH-5	15497
Flare 6	530	9606
AU2 Flare	611	2612
Temporary Control Device No. 1	TEMP1	47256/PSDTX402M2
Temporary Control Device No. 2	TEMP2	47256/PSDTX402M2

STORAGE TANKS		
Tank Number	EPN	NSR Permit No.
Tank 4	280-4	47256/PSDTX402M2
Tank 5	280-5	47256/PSDTX402M2
Tank 7	280-7	47256/PSDTX402M2
Tank 8	280-8	2231
Tank 9	280-9	2231
Tank 10	280-10	2231
Tank 11	280-11	47256/PSDTX402M2
Tank 12	280-12	47256/PSDTX402M2

ATTACHMENT D

Flexible Permit Numbers 47256 and PSDTX402M2

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STORAGE TANKS		
Tank Number	EPN	NSR Permit No.
Tank 13	280-13	47256/PSDTX402M2
Tank 13A	280-13A	47256/PSDTX402M2
Tank 14	280-14	47256/PSDTX402M2
Tank 14A	280-14A	47256/PSDTX402M2
Tank 16	280-16	47256/PSDTX402M2
Tank 17	280-17	47256/PSDTX402M2
Tank 18	280-18	47256/PSDTX402M2
Tank 19	280-19	2231
Tank 20	280-20	2231
Tank 22	280-22	47256/PSDTX402M2
Tank 23	280-23	47256/PSDTX402M2
Tank 24	280-24	47256/PSDTX402M2
Tank 25	280-25	47256/PSDTX402M2
Tank 26	280-26	47256/PSDTX402M2
Tank 27	280-27	47256/PSDTX402M2
Tank 28	280-28	2231
Tank 29	280-29	2231
Tank 30	280-30	2231
Tank 31	280-31	47256/PSDTX402M2
Tank 32	280-32	47256/PSDTX402M2
Tank 34	280-34	47256/PSDTX402M2
Tank 36	280-36	2231
Tank 37	280-37	2231 and 47256/PSDTX402M2
Tank 38	280-38	2231 and 47256/PSDTX402M2
Tank 39	280-39	2231 and 47256/PSDTX402M2
Tank 41	280-41	47256/PSDTX402M2
Tank 42	280-42	47256/PSDTX402M2
Tank 43	280-43	47256/PSDTX402M2
Tank 43A	280-43A	47256/PSDTX402M2
Tank 44	280-44	47256/PSDTX402M2
Tank 45	280-45	47256/PSDTX402M2
Tank 46	280-46	47256/PSDTX402M2
Tank 47	280-47	47256/PSDTX402M2
Tank 48	280-48	47256/PSDTX402M2
Tank 48A	280-48A	47256/PSDTX402M2
Tank 49	280-49	47256/PSDTX402M2
Tank 50	280-50	47256/PSDTX402M2

ATTACHMENT D

Flexible Permit Numbers 47256 and PSDTX402M2

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STORAGE TANKS		
Tank Number	EPN	NSR Permit No.
Tank 51	280-51	47256/PSDTX402M2
Tank 52	280-52	47256/PSDTX402M2
Tank 53	280-53	47256/PSDTX402M2
Tank 54	280-54	47256/PSDTX402M2
Tank 55	280-55	47256/PSDTX402M2
Tank 56	280-56	47256/PSDTX402M2
Tank 57	280-57	47256/PSDTX402M2
Tank 59	280-59	47256/PSDTX402M2
Tank 60	280-60	47256/PSDTX402M2
Tank 60A	280-60A	47256/PSDTX402M2
Tank 61	280-61	47256/PSDTX402M2
Tank 63	280-63	47256/PSDTX402M2
Tank 64	280-64	47256/PSDTX402M2
Tank 65	280-65	47256/PSDTX402M2
Tank 66	280-66	47256/PSDTX402M2
Tank 67	280-67	47256/PSDTX402M2
Tank 71	280-71	47256/PSDTX402M2
Tank 72	280-72	47256/PSDTX402M2
Tank 73	280-73	47256/PSDTX402M2
Tank 73A	280-73A	47256/PSDTX402M2
Tank 80	280-80	47256/PSDTX402M2
Tank 90	280-90	47256/PSDTX402M2
Tank 91	280-91	47256/PSDTX402M2
Tank 92	280-92	47256/PSDTX402M2
Tank 93	280-93	47256/PSDTX402M2
Tank 94	280-94	47256/PSDTX402M2
Tank 95	280-95	47256/PSDTX402M2
Tank 97	280-97	47256/PSDTX402M2
Tank 98	280-98	47256/PSDTX402M2
Tank 100	280-100	47256/PSDTX402M2
Tank 101	280-101	2231
Tank 102	280-102	2231
Tank 103	280-103	47256/PSDTX402M2
Tank 103A	280-103A	47256/PSDTX402M2
Tank 104	280-104	47256/PSDTX402M2
Tank 105	280-105	47256/PSDTX402M2
Tank 106	280-106	47256/PSDTX402M2

ATTACHMENT D

Flexible Permit Numbers 47256 and PSDTX402M2

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STORAGE TANKS		
Tank Number	EPN	NSR Permit No.
Tank 107	280-107	2231
Tank 108A	280-108A	2231
Tank 110	280-110	47256/PSDTX402M2
Tank 111	280-111	2231
Tank 112	280-112	2231
Tank 113	280-113	2231
Tank 114	280-114	2231
Tank 115	280-115	2231
Tank 116	280-116	2231
Tank 117	280-117	47256/PSDTX402M2
Tank 117A	280-117A	47256/PSDTX402M2
Tank 118	280-118	47256/PSDTX402M2
Tank 127	280-127	47256/PSDTX402M2
Tank 128	280-128	47256/PSDTX402M2
Tank 129	280-129	47256/PSDTX402M2
Tank 130	280-130	47256/PSDTX402M2
Tank 131	280-131	47256/PSDTX402M2
Tank 140	280-140	47256/PSDTX402M2
Tank 181	280-181	47256/PSDTX402M2
Tank 183	280-183	2231
Tank 184	280-184	2231
Tank 185	280-185	2231
Tank 186	280-186	2231
Tank 187	280-187	2231
Tank 188	280-188	2231
Tank 269	280-269	47256/PSDTX402M2
Tank 269A	280-269A	47256/PSDTX402M2
Tank 270	280-270	47256/PSDTX402M2
Tank 295	280-295	47256/PSDTX402M2
Tank 296	280-296	47256/PSDTX402M2
Tank 297	280-297	47256/PSDTX402M2
Tank 298	280-298	47256/PSDTX402M2
Tank 501	280-501	47256/PSDTX402M2
Tank 502	280-502	47256/PSDTX402M2
Tank 503	280-503	47256/PSDTX402M2
Tank 504	280-504	47256/PSDTX402M2
Tank 520	280-520	2231

ATTACHMENT D

Flexible Permit Numbers 47256 and PSDTX402M2

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STORAGE TANKS		
Tank Number	BBN	NSR Permit No.
Tank 528	280-528	47256/PSDTX402M2
Tank 529	280-529	47256/PSDTX402M2
Tank 530	280-530	47256/PSDTX402M2
Tank 531	280-531	47256/PSDTX402M2
Tank 532	280-532	2231
Tank 533	280-533	2231
Tank 534	280-534	2231
Tank 535	280-535	2231
Tank 536	280-536	47256/PSDTX402M2
Tank 537	280-537	1940
Tank 538	280-538	2231
Tank 560	280-560	47256/PSDTX402M2
Tank 561	280-561	47256/PSDTX402M2
Tank 608-F	108-608	2231
Tank 609-F	108-609	2231
Tank 652	280-652	47256/PSDTX402M2
Tank 653	280-653	47256/PSDTX402M2
Tank 1004	280-1004	47256/PSDTX402M2
Tank 1004A	280-1004A	47256/PSDTX402M2
Tank 1011	76	6592
Tank 1012	480-1012	47256/PSDTX402M2
Tank 1013	480-1013	47256/PSDTX402M2
Tank 1018	280-1018	47256/PSDTX402M2
Tank 1020	280-1020	47256/PSDTX402M2
Tank 1021	280-1021	47256/PSDTX402M2
Tank 1023	280-1023	47256/PSDTX402M2
Tank 1024	280-1024	47256/PSDTX402M2
Tank 1025	280-1025	47256/PSDTX402M2
Tank 1039	280-1039	47256/PSDTX402M2
Tank 1041	280-1041	2231
Tank 1042	280-1042	2231
Tank 1044	280-1044	2231
Tank 1045	280-1045	47256/PSDTX402M2
Tank 1046	280-1046	47256/PSDTX402M2
Tank 1047	280-1047	47256/PSDTX402M2
Tank 1048	280-1048	47256/PSDTX402M2
Tank 1051	280-1051	47256/PSDTX402M2

ATTACHMENT D

Flexible Permit Numbers 47256 and PSDTX402M2

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STORAGE TANKS		
Tank Number	EPN	NSR Permit No.
Tank 1052	280-1052	4714
Tank 1053	280-1053	4714
Tank 1055	280-1055	47256/PSDTX402M2
Tank 3010	280-3010	47256/PSDTX402M2
Tank 4000	280-4000	47256/PSDTX402M2
Tank 4011	280-4011	47256/PSDTX402M2
Tank 4016	280-4016	47256/PSDTX402M2

Dated January 3, 2011

ATTACHMENT E

Flexible Permit Numbers 47256 and PSDTX402M2

Emission Points included in Normal Operation Emission Caps

This table indicates the emission caps which normal operations emissions from an emission point are included in.

EPA ID	SOURCE NAME	Emissions from emission point included in normal operations emission caps for							
		VOC	NO _x	CO	SO ₂	H ₂ S	PM ₁₀	Benzene	NIH
33	FCCU 3 404B Heater	X	X	X	X		X		
34	FCCU No. 3 (1)	X	X	X	X		X		X
61	FCCU 2 BA201 Heater	X	X	X	X		X		
78	Coker Feed Preheater B302	X	X	X	X		X		
93	FCCU No. 1	X	X	X	X		X		X
161	301-B Reheat Heaters	X	X	X	X		X		
162	302-B Reheat Heaters	X	X	X	X		X		
164	UU3 304-B Regeneration Flue Gas Heater	X	X	X	X		X		
165	UU3 305-B Hot Oil Heater	X	X	X	X		X		
167	UU3 306-B Preheat Heater	X	X	X	X		X		
168	307-A/B Desulfurizer Heater	X	X	X	X		X		
169	UU3 308-B Process Heater	X	X	X	X		X		
195-F	HUF Fugitives	X						X	
201	ULC 100B Heater	X	X	X	X		X		
202	ULC 101B Heater	X	X	X	X		X		
203	ULC 102B Heater (2)	X	X	X	X		X		
204	ULC 103B Heater	X	X	X	X		X		
205	ULC 104BA Heater (2)	X	X	X	X		X		
205	ULC 104BB Heater (2)	X	X	X	X		X		
206	ULC 105BA Heater	X	X	X	X		X		
206	ULC 105BB Heater	X	X	X	X		X		
280-4	Tank 4	X						X	
280-5	Tank 5	X						X	
280-11	Tank 11	X						X	
280-12	Tank 12	X						X	
280-13	Tank 13	X						X	
280-13A	Tank 13A	X						X	
280-14	Tank 14	X						X	
280-14A	Tank 14A	X						X	
280-16	Tank 16	X						X	
280-17	Tank 17	X						X	
280-18	Tank 18	X						X	
280-22	Tank 22	X						X	
280-23	Tank 23	X						X	
280-24	Tank 24	X						X	
280-25	Tank 25	X						X	
280-26	Tank 26	X						X	
280-27	Tank 27	X						X	

ATTACHMENT E

Flexible Permit Numbers 47256 and PSDTX402M2

Page 2

EPN	SOURCE NAME	Emissions from emission point included in normal operations emission cap for							
		VOC	NO _x	CO	SO ₂	H ₂ S	PM ₁₀	PM _{2.5}	NI
280-31	Tank 31	X							X
280-32	Tank 32	X							X
280-34	Tank 34	X							X
280-37	Tank 37	X							X
280-38	Tank 38	X							X
280-39	Tank 39	X							X
280-41	Tank 41	X							X
280-42	Tank 42	X							X
280-43	Tank 43	X							X
280-43A	Tank 43A	X							X
280-44	Tank 44	X							X
280-45	Tank 45	X							X
280-46	Tank 46	X							X
280-47	Tank 47	X							X
280-48	Tank 48	X							X
280-48A	Tank 48A	X							X
280-49	Tank 49	X							X
280-50	Tank 50	X							X
280-51	Tank 51	X							X
280-52	Tank 52	X							X
280-53	Tank 53	X							X
280-54	Tank 54	X							X
280-55	Tank 55	X							X
280-56	Tank 56	X							X
280-57	Tank 57	X							X
280-59	Tank 59	X							X
280-60	Tank 60	X							X
280-60A	Tank 60A	X							X
280-61	Tank 61	X							X
280-63	Tank 63	X							X
280-64	Tank 64	X							X
280-65	Tank 65	X							X
280-66	Tank 66	X							X
280-67	Tank 67	X							X
280-71	Tank 71	X							X
280-72	Tank 72	X							X
280-73	Tank 73	X							X
280-73A	Tank 73A	X							X
280-80	Tank 80	X							X
280-90	Tank 90	X							X
280-91	Tank 91	X							X
280-92	Tank 92	X							X
280-93	Tank 93	X							X
280-94	Tank 94	X							X
280-95	Tank 95	X							X

ATTACHMENT E

Flexible Permit Numbers 47256 and PSDTX402M2

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EPN	SOURCE NAME	Emissions from emission points included in normal operations							Emission caps for	
		VOC	NO _x	CO ₂	SO ₂	H ₂ S	PM ₁₀	Benzene	HF	
280-97	Tank 97	X						X		
280-98	Tank 98	X						X		
280-100	Tank 100	X				X			X	
280-103	Tank 103	X						X		
280-103A	Tank 103A	X						X		
280-104	Tank 104	X						X		
280-105	Tank 105	X						X		
280-106	Tank 106	X						X		
280-110	Tank 110	X						X		
280-117	Tank 117	X						X		
280-117A	Tank 117A	X						X		
280-118	Tank 118	X						X		
280-127	Tank 127	X						X		
280-128	Tank 128	X						X		
280-129	Tank 129	X						X		
280-130	Tank 130	X						X		
280-131	Tank 131	X						X		
280-140	Tank 140	X						X		
280-181	Tank 181	X						X		
280-269	Tank 269	X						X		
280-269A	Tank 269A	X						X		
280-270	Tank 270	X						X		
280-295	Tank 295	X						X		
280-296	Tank 296	X						X		
280-297	Tank 297	X						X		
280-298	Tank 298	X						X		
280-501	Tank 501	X						X		
280-502	Tank 502	X						X		
280-503	Tank 503	X						X		
280-504	Tank 504	X						X		
280-528	Tank 528	X						X		
280-529	Tank 529	X						X		
280-530	Tank 530	X						X		
280-531	Tank 531	X						X		
280-536	Tank 536	X						X		
280-560	Tank 560	X						X		
280-561	Tank 561	X						X		
280-652	Tank 652	X						X		
280-653	Tank 653	X						X		
280-1004	Tank 1004	X						X		
280-1004A	Tank 1004A	X						X		
280-1018	Tank 1018	X						X		
280-1020	Tank 1020	X						X		
280-1021	Tank 1021	X						X		
280-1023	Tank 1023	X						X	X	

ATTACHMENT E

Flexible Permit Numbers 47256 and PSDTX402M2

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EPN	SOURCE NAME	Emissions from emission point included in normal operations emission cap for							
		VOC	NO _x	CO	SO ₂	H ₂ S	PM ₁₀	Benzene	NH ₃
280-1024	Tank 1024	X						X	
280-1025	Tank 1025	X						X	
280-1039	Tank 1039	X						X	
280-1045	Tank 1045	X						X	
280-1046	Tank 1046	X						X	
280-1047	Tank 1047	X						X	
280-1048	Tank 1048	X						X	
280-1051	Tank 1051	X						X	X
280-1055	Tank 1055	X						X	
280-3010	Tank 3010	X						X	
280-4000	Tank 4000	X						X	
280-4011	Tank 4011	X						X	
280-4016	Tank 4016	X						X	
294-1	Thermal Oxidizer	X	X	X	X			X	
294-2	Thermal Oxidizer	X	X	X	X			X	
294-3	Thermal Oxidizer	X	X	X	X			X	
299-32	Marine Dock	X						X	
299-33	Marine Docks	X						X	
299-34	Marine Docks	X						X	
299-37	Marine Docks	X						X	
299-38	Marine Docks	X						X	
311	Refinery Flare No. 2	X	X	X	X	X		X	X
321	Refinery Flare No. 3	X	X	X	X	X		X	X
331	Refinery Flare No. 4	X	X	X	X	X		X	X
351A	ULC Flare	X	X	X	X	X		X	X
381	SRU A/B Flare	X	X	X	X	X		X	X
383	SRU C/D Flare	X	X	X	X	X		X	X
384	SRU Incinerator C and D	X	X	X	X		X		
391	DDU B-101/102 Heaters	X	X	X	X		X		
392	DDU B-201/202 Heaters	X	X	X	X		X		
394	DDU B-301 Heater	X	X	X	X		X		
395	DDU B-302 Reboiler	X	X	X	X		X		
396A	DDU Flare	X	X	X	X	X		X	X
400	Flare 8	X	X	X	X	X		X	X
411	Alky 2 Cooling Tower	X					X		
412	Coker Cooling Tower	X					X		
413	FCCU 1 Cooling Tower	X					X		
415	FCCU 3 Cooling Tower	X					X		
416	Power 3 Cooling Tower	X					X		
418	ULC Cooling Tower	X					X		
419	NDU Cooling Tower	X					X		
421	UU3 Cooling Tower	X					X		
426	CFHU Cooling Tower	X					X		
453	Oil/Water Separator	X						X	
454	Oil/Water Separator	X						X	

ATTACHMENT E

Flexible Permit Numbers 47256 and PSDTX402M2

Page 5

EPN	SOURCE NAME	Emissions from emission points included in normal operations (emission caps for)							
		VOG	NO _x	CO	SO ₂	H ₂ S	PM ₁₀	Benzene	NH ₃
471	CFHU Heaters 101-B and 102-B	X	X	X	X		X		
480-1012	Tank 1012	X						X	
480-1013	Tank 1013	X						X	
481	RHU Heaters Train 200	X	X	X	X		X		
482	RHU Heaters Train 300	X	X	X	X		X		
483	RHU Heaters Train 400	X	X	X	X		X		
484	RHU Fractionation Heaters	X	X	X	X		X		
485	RHU VRS Hot Oil Heater	X	X	X	X		X		
501	CFHU Flare 1	X	X	X	X	X		X	X
550	RDU Heater	X	X	X	X		X		
551	RDU Fugitives	X						X	
E-02/03	FCCU1 Waste Water Vent 3	X						X	
E-06	Oil/Water Separator - FCCU 3 Unit	X						X	
E-08	Oil/Water Separator - FCCU 2 Unit	X						X	
E-13	Oil/Water Separator - FCCU 3 Unit	X						X	
E-14	Oil/Water Separator - Pipe Stills Unit	X						X	
E-16	Oil/Water Separator - Pipe Stills Unit	X						X	
E-34	Oil/Water Separator - RDU Unit	X						X	
E-35	Oil/Water Separator - CFHU Unit	X						X	
E-48	Oil/Water Separator - RHU Unit	X						X	
E-63	Oil/Water Separator - RHU Unit	X						X	
E-68	Lab Wastewater Collection Sump	X						X	
E-69	Environmental Facilities Sump	X						X	
E-98	Exchanger Pad Dry Weather Sump #30	X						X	
E-99	Dry Weather Sump #33	X						X	
F-8	Activated Sludge Unit No. 1	X						X	X
F-9	Activated Sludge Unit No. 2	X						X	X
F-11	Final Clarifier Tank No. 2	X						X	X
F-22	Clarifier Effluent Tank	X						X	X
F-30	FCCU 3 Fugitives	X				X		X	X
F-30	Final Effluent Tank	X						X	X
F-60	FCCU 2 Fugitives	X				X		X	X
F-90	FCCU1 Fugitives	X				X		X	X
F-160	UU3 Fugitives	X						X	
F-200	Ultracracker Fugitives	X				X		X	
F-270	API Separator No. 3A	X						X	
F-280	Tank Farm Fugitives	X						X	
F-294	Marine Loading Fugitives	X						X	
F-379	Dock 54 Fugitives	X						X	
F-380	SRU Fugitives	X				X			
F-390	DDU 100/200 Fugitives	X				X		X	
F-393	DDU 300 Fugitives	X				X		X	X

ATTACHMENT E

Flexible Permit Numbers 47256 and PSDTX402M2

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EPN	SOURCE NAME	Emissions from emission point included in normal operations emission caps for							
		VOC	NO _x	CO	SO ₂	H ₂ S	PM ₁₀	Benzene	NH ₃
F-400	Flare 8 Fugitives	X				X		X	
F-470	CFHU Fugitives	X				X		X	
F-480	RHU Fugitives	X						X	
F-486	HRU Fugitives	X				X		X	
F-490	Acid Plant H ₂ S Feed	X							
F-491	Acid Plant Sludge Feed	X							
FLR-SW	SRU Sour Water System Flare	X	X	X	X	X		X	X
W-01	Oil/Water Separator - UU4 Unit	X						X	
W-02	Oil/Water Separator - DDU Unit	X						X	
W-06	Oil/Water Separator - ULC/ARU Unit	X						X	
W-07	Oil/Water Separator - ULC Unit	X						X	
W-12	Oil/Water Separator - UU3 Unit	X						X	
W-13	Oil/Water Separator - UU3 Unit	X						X	

X Emissions from this EPN are included in both the initial and final emission cap.

- (1) Facility does not participate in normal operation annual cap for VOC, PM₁₀, or CO. The facility does participate in the normal operation short-term cap (lb/hr) and the MSS cap for all air contaminants.
- (2) Facility does not participate in normal operation annual cap for VOC, NO_x, CO, SO₂, or PM₁₀. The facility does participate in the normal operation short-term cap (lb/hr) and the MSS cap for all air contaminants.

Dated January 3, 2011

EMISSION SOURCES - EMISSION CAPS AND INDIVIDUAL EMISSION LIMITS

Flexible Permit Numbers 47256 and PSDTX402M2

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Initial Caps - Effective July 13, 2005 through July 12, 2010

Final Caps - Effective July 13, 2010

AIR CONTAMINANTS DATA				
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
Initial Caps - Normal Operations				
See Attachment E	See Attachment E	VOC	1737.12	1995.01
		NO _x	1546.20	3162.62
		CO	2298.16	2264.55
		SO ₂	3729.82	3431.04
		H ₂ S	5.05	17.43
		PM ₁₀	320.53	690.11
		Benzene (4)	33.36	84.10
		NH ₃	18.48	60.82
Final Caps - Normal Operations				
See Attachment E	See Attachment E	VOC	1520.67	1893.61
		NO _x	766.12	2510.50
		CO	1256.63	2888.07
		SO ₂	1404.10	4624.81
		H ₂ S	4.40	13.19
		PM ₁₀	186.08	364.06
		Benzene (4)	33.12	80.35
		NH ₃	12.53	39.07

EMISSION SOURCES - EMISSION CAPS AND INDIVIDUAL EMISSION LIMITS

AIR CONTAMINANTS DATA				
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
Planned Maintenance, Startup, and Shutdown Activities				
See Attachments A-D	See Attachments A-D	VOC	2433.78	172.50
		NO _x	157.86	24.36
		CO	790.56	136.31
		SO ₂	8419.88	842.16
		H ₂ S	89.57	9.31
		Benzene (4)	33.12	2.05
		NH ₃	18.40	1.86
Planned Turnaround Maintenance, Startup, and Shutdown Activities				
See Attachments A-D	See Attachments A-D	VOC (5)	3133.28	91.70
		NO _x (5)	325.87	10.56
		CO (5)	3627.58	75.48
		SO ₂ (5)	8089.14	20.68
		H ₂ S (5)	87.70	0.32
		PM ₁₀ (5)	123.64	1.04
		Benzene (4) (5)	28.05	0.23
Individual Emission Limits				
486	HRU R22 Fugitives	R-22	0.82	3.61
34	FCCU No. 3	VOC		45.84
		PM		321.6
		CO		945.2
203	ULC-102B Heater	VOC		1.44
		NO _x		25.55
		CO		19.50
		SO ₂		7.13
		PM		1.99

EMISSION SOURCES - EMISSION CAPS AND INDIVIDUAL EMISSION LIMITS

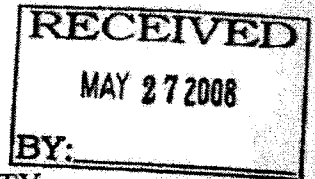
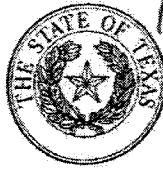
AIR CONTAMINANTS DATA				
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
205	ULC-104BA/BB Heaters	VOC		4.65
		NO _x		104.07
		CO		62.87
		SO ₂		22.86
		PM		6.43
280-118	Tank 118	VOC	0.48	1.26
		Benzene	0.13	0.07

EMISSION SOURCES - EMISSION CAPS AND INDIVIDUAL EMISSION LIMITS

- (1) Emission point identification - either specific equipment designation or emission point number from a plot plan.
 - (2) Specific point source names. For fugitive sources, use an area name or fugitive source name.
 - (3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
NO_x - total oxides of nitrogen
CO - carbon monoxide
SO₂ - sulfur dioxide
H₂S - hydrogen sulfide
PM - particulate matter
PM₁₀ - particulate matter (PM) equal to or less than 10 microns in diameter. Where PM is not listed, it shall be assumed that no PM greater than 10 microns is emitted.
NH₃ - ammonia
R-22 - refrigerant R-22
 - (4) The emission rates listed for the benzene cap are included in the VOC cap.
 - (5) Annual emissions from planned turnaround maintenance, startup, and shutdown (MSS) activities are above and beyond the emissions from normal operations and planned MSS activities. Short-term emissions from the plant due to normal operations, planned MSS activities, and planned turnaround MSS activities should not exceed the short-term planned turnaround MSS activities emission rates.
- * Emission rates are based on and the facilities are limited by the following maximum operating schedule:
____ Hrs/day ____ Days/week ____ Weeks/year or 8,760 Hrs/year
- ** Compliance with annual emission limits is based on a rolling 12-month period.

Dated January 3, 2011

Buddy Garcia, *Chairman*
Larry R. Soward, *Commissioner*
Bryan W. Shaw, Ph.D., *Commissioner*
Glenn Shankle, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 19, 2008

MS KATHERINE GARDNER
ENVIRONMENTAL MANAGER
BP PRODUCTS NORTH AMERICA INC
PO BOX 401
TEXAS CITY TX 77592-0401

Re: Permit Amendment
Permit Numbers: 19599 and PSD-TX-023
Pipestill 3B and Heater 401BC
Texas City, Galveston County
Regulated Entity Number: RN102535077
Customer Reference Number: CN600866800
Account Number: GB-0004-L

Dear Ms. Gardner:

This is in response to your letter received November 16, 2007, and your Form PI-1 (General Application for Air Preconstruction Permits and Amendments) concerning the proposed amendment to Permit Numbers 19599 and PSD-TX-023. We understand that you propose to update the authorized emissions from Emission Point No. (EPN) 44 and to consolidate emissions now authorized at EPNs 43A and 45 into EPN 43A. Also, this will acknowledge that your application for the above-referenced permit is technically complete as of February 25, 2008.

As indicated in Title 30 Texas Administrative Code §§ 116.116(b) and 116.160 [30 TAC §§ 116.116(b) and 116.160], and based on our review, Permit Number 19599 is hereby amended and PSD-TX-023 is modified. This information will be incorporated into the existing permit files. Enclosed is a revised maximum allowable emission rates table to replace that currently attached to your permit. We appreciate your continuing careful review of the special conditions of the permit and assuring that all requirements are consistently met.

No planned maintenance, start-up, and shutdown emissions have been reviewed or represented in this application and none are authorized by this permit.

Ms. Katherine Gardner
Page 2
May 19, 2008

Re: Permit Numbers 19599 and PSD-TX-023

As of July 1, 2008, all analytical data generated by a mobile or stationary laboratory in support of compliance with air permits must be obtained from a NELAC (National Environmental Laboratory Accreditation Conference) accredited laboratory under the Texas Laboratory Accreditation Program or meet one of several exemptions. Specific information concerning which laboratories must be accredited and which are exempt may be found in 30 TAC §§ 25.4 and 25.6.

For additional information regarding the laboratory accreditation program and a list of accredited laboratories and their fields of accreditation, please see the following website:

http://www.tceq.state.tx.us/compliance/compliance_support/qa/env_lab_accreditation.html

For questions regarding the accreditation program, you may contact the Texas Laboratory Accreditation Program at (512) 239-3754 or by e-mail at labprgms@tceq.state.tx.us.

You may file a motion to overturn with the Chief Clerk. A motion to overturn is a request for the commission to review the Texas Commission on Environmental Quality (TCEQ) Executive Director's approval of the application. Any motion must explain why the commission should review the TCEQ Executive Director's action.

A motion to overturn must be received by the Chief Clerk within 23 days after the date of this letter. An original and 11 copies of a motion must be filed with the Chief Clerk in person or by mail. The Chief Clerk's mailing address is Office of the Chief Clerk (MC-105), Texas Commission on Environmental Quality, P.O. Box 13087, Austin, Texas 78711-3087. On the same day the motion is transmitted to the Chief Clerk, please provide copies to Mr. Robert Martinez, Director, Environmental Law Division (MC-173), and Mr. Blas J. Coy, Jr., Public Interest Counsel (MC-103), both at the same TCEQ address above. If a motion is not acted on by the commission within 45 days after the date of this letter, then the motion shall be deemed overruled.

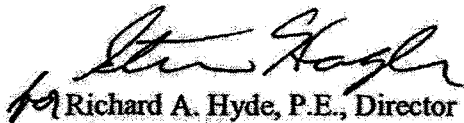
Your cooperation in this matter is appreciated. If you need further information or have any questions, please contact Mr. Ramiro Cruz, P.E., at (512) 239-1302 or write to the Texas Commission on Environmental Quality, Office of Permitting, Remediation, and Registration, Air Permits Division (MC-163), P.O. Box 13087, Austin, Texas 78711-3087.

Ms. Katherine Gardner
Page 3
May 19, 2008

Re: Permit Numbers 19599 and PSD-TX-023

This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,



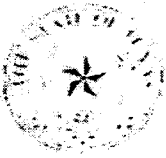
Richard A. Hyde, P.E., Director
Air Permits Division
Office of Permitting, Remediation, and Registration
Texas Commission on Environmental Quality

RAH/RC/bvg

Enclosure

cc: Director, Pollution Control Division, Galveston County Health District, La Marque
Air Section Manager, Region 12 - Houston
Air Permits Section Chief, New Source Review, Section (6PD-R), Environmental
Protection Agency, Region 6, Dallas

Project Number: 134249



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY AIR QUALITY PERMIT - GENERAL CONDITIONS

AND PERTINENT RULES EFFECTIVE FOR PERMITS ISSUED
OR AMENDED ON OR AFTER AUGUST 16, 1994



1. **Facilities covered by this permit** shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code § 116.116 (30 TAC § 116.116)]
2. **Voiding of Permit.** A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant a 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, air netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property, and (b)(1) the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10% of the estimated total cost of the project up to a maximum of \$5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC § 116.120(a), (b) and (c)]
3. **Construction Progress.** Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC § 116.115(b)(2)(A)]
4. **Start-up Notification.** The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify to the Office of Permitting, Remediation, and Registration the source or sources of allowances to be utilized for compliance with Chapter 10, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC § 116.115(b)(2)(B)]
5. **Sampling Requirements.** If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC § 116.115(b)(2)(C)]
6. **Equivalency of Methods.** The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC § 116.115(b)(2)(D)]
7. **Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, record shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction; comply with any additional recordkeeping requirements specified in special conditions attached to the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC § 116.115(b)(2)(E)]
8. **Maximum Allowable Emission Rates.** The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources - Maximum Allowable Emission Rates." [30 TAC § 116.115(b)(2)(F)]
9. **Maintenance of Emission Control.** The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification for upsets and maintenance in accordance with §§ 101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance; Startup and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC § 116.115(b)(2)(G)]
10. **Compliance with Rules.** Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules, regulations, and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition are applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC § 116.115(b)(2)(H)]
11. This permit may be appealed pursuant to 30 TAC § 50.139.
12. This permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC § 116.110(e)]
13. There may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC § 116.115(c)]
14. **Emissions from this facility** must not cause or contribute to a condition of "air pollution" as defined in TCAA § 382.003(3) or violate TCAA § 382.085, as codified in the Texas Health and Safety Code. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Numbers 19599 and PSD-TX-023

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
41	401BA	CO	11.60	42.30
		NO _x	37.00	135.00
		PM ₁₀	1.50	5.30
		SO ₂	7.80	28.40
		VOC	0.40	1.50
42	401BB	CO	11.60	42.30
		NO _x	37.00	135.00
		PM ₁₀	1.50	5.30
		SO ₂	7.80	28.40
		VOC	0.40	1.50
43A	PS3B Heaters 402BE, 402BF, and 402BG	CO	26.74	114.12
		NO _x	32.56	87.86
		PM ₁₀	3.77	16.87
		SO ₂	11.08	46.79
		VOC	1.91	8.20
44	PS3B Heater 401BC (6)	CO	23.68	84.27
		NO _x	11.20	39.86
		PM ₁₀	2.29	9.62
		SO ₂	8.11	34.10
		VOC	1.66	6.96
46	Oil Water Separator	VOC	5.80	25.00
47	Oil Water Separator	VOC	0.90	4.00

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
51	101-BA/BB	CO	29.90	109.00
		NO _x	47.62	173.80
		PM ₁₀ (5)	3.70	13.60
		SO ₂ (5)	20.10	73.30
		VOC	1.00	3.80
53	102-BA/BB	CO	22.90	83.60
		NO _x	18.20	66.40
		PM ₁₀ (5)	1.40	5.20
		SO ₂ (5)	7.70	28.00
		VOC	0.80	3.00
55	103-B	CO	5.65	24.72
		NO _x	15.80	65.70
		PM ₁₀ (5)	2.42	10.61
		SO ₂ (5)	3.80	16.62
		VOC	0.20	0.87
56	Oil Water Separator	VOC	4.40	19.00
417	Cooling Tower	VOC	1.26	5.52
F-40	Process Fugitives Pipestill No. 3A (4)	H ₂ S	0.34	1.47
		VOC	26.56	116.35
F-50	Process Fugitives Pipestill No. 3B (4)	H ₂ S	0.28	1.24
		VOC	22.31	97.72

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

- (3) CO - carbon monoxide
- H₂S - hydrogen sulfide
- NO_x - total oxides of nitrogen
- PM₁₀ - particulate matter equal to or less than 10 microns in diameter
- SO₂ - sulfur dioxide
- VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1.
- (4) Fugitive emissions are an estimate only and not be considered as a maximum allowable emission rate.
- (5) PSD-TX-023 pollutant
- (6) Includes emissions authorized under Standard Permit (SP) Registration Number 81757. The SP Number 81757 has been consolidated by reference into Permit Number 19599, and no best available control technology review has been done for it. The emission increases, however, satisfied effects review.

* Emission rates are based on and the facilities are limited by the following maximum operating schedule:

24 Hrs/day 7 Days/week 52 Weeks/year

** Compliance with annual emission limits is based on a rolling 12-month period.

Dated May 19, 200